

**CONSOLIDATED PLAN
5 YEAR STRATEGY
(JULY 1, 2014 THROUGH JUNE 30, 2019)**

&

**PROGRAM YEAR 2014
ACTION PLAN
(JULY 1, 2014 THROUGH JUNE 30, 2015)**

FOR

HOUSING AND COMMUNITY DEVELOPMENT

PREPARED BY:

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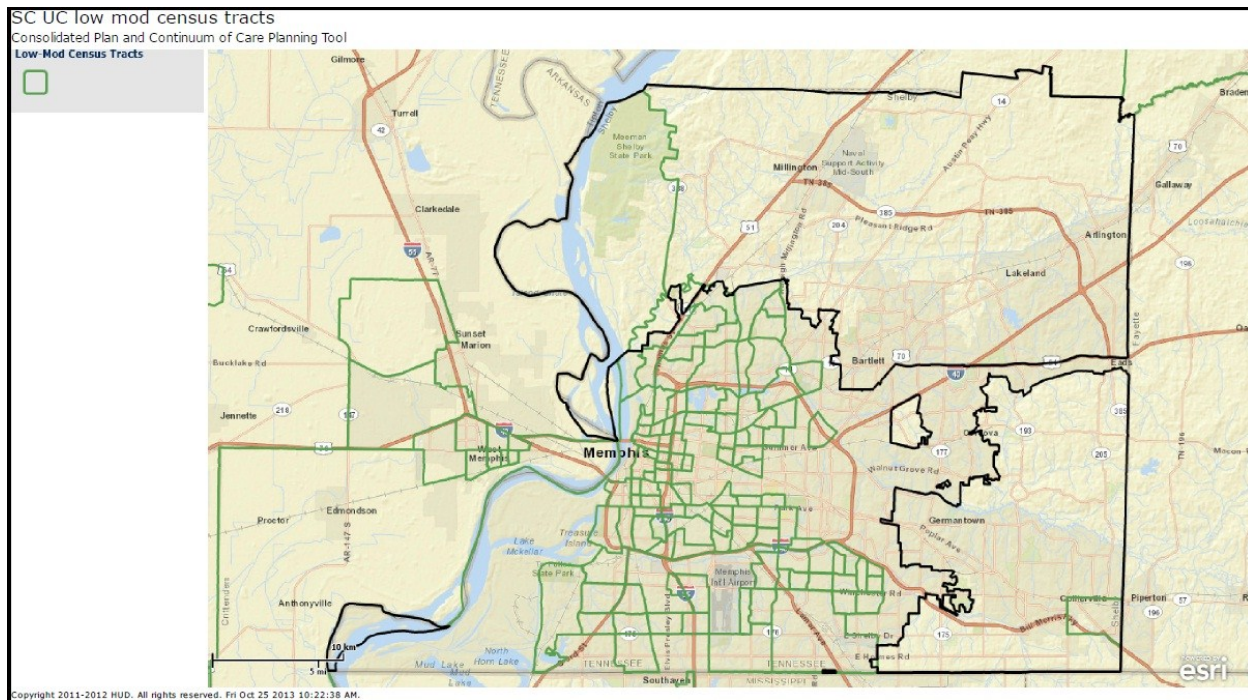
Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

This document outlines the 5 Year Strategy for the use of federal funds granted to Shelby County by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. This Strategy covers the period from July 1, 2014 through June 30, 2018 and includes five HUD program years. Activities associated with the use of these funds are designated for the Shelby County Urban Entitlement Area including the municipalities of Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington as well as unincorporated areas of Shelby County. Programs and activities described in this plan are intended to primarily benefit low- and moderate-income residents of the Shelby County Urban Entitlement Area including areas with concentrations of low- and moderate-income residents. Shelby County will also use this plan as a basis for coordination with other federal, state, and local programs and initiatives.

The Shelby County Urban Entitlement Area is a diverse community composed of a mixture of suburban and rural development. The map below depicts the Shelby County Urban County Entitlement Area (outlined in bold black lines) as well as low- and moderate income census tracts in Shelby County.



Shelby County Low- and Moderate-Income Census Tracts

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment

Overview

High priority needs identified in the 5 Year Strategy planning process include:

- Housing Choice, Rehabilitation, Modification, & Repair;
- Flood Drain Improvements;
- Parks and Recreational Facilities;
- Senior Centers;
- Sidewalks,
- Street Improvements; and
- Water and Sewer Improvements.

This 5 Year Strategy establishes three goals to guide the use of CDBG and HOME funds from June 1, 2014 through June 30, 2019 in order to address high priority needs identified in the 5 year Strategy. These three goals are described and summarized below.

Goal 1. Preserve the existing housing stock and create opportunities for fair/affordable housing choice.

Categories: Affordable Housing & Non-Homeless Special Needs
Needs Addressed: Housing Rehabilitation, Modification, & Repair
Outcomes: Rehabilitated owner-occupied housing units

Goal 2. Reduce the harmful affects of lead-based paint

Categories: Affordable Housing
Needs Addressed: Housing Rehabilitation, Modification, & Repair
Outcomes: Lead-safe housing units with children less than 6 years of age

Goal 3. Improve communities

Categories: Accessibility & Non-Homeless Special Needs
Needs Addressed: Flood drain improvements, parks and recreational facilities, senior centers
sidewalks, and street improvements
Outcomes: Public facilities or infrastructure activities

3. Evaluation of past performance

SCDH has been a CDBG Urban Entitlement grantee since 1992 and a HOME participating jurisdiction since 1994. Since that time, SCDH has sought to expand its partnership base in order to utilize existing resources more efficiently and create greater impact for each HUD dollar spent in Shelby County. Since becoming a grantee, SCDH has inspected over 1,000 housing units, fully rehabilitated more than 800 homes, made more than 800 units lead safe, and completed more than 100 public facility and infrastructure projects. This record of successful accomplishment has been integral to exceeding program goals and benchmarks and has provided the capacity to implement the strategies necessary to address the high priority housing and community development needs described in this 5-Year Strategy.

4. Summary of citizen participation process and consultation process

A public notice promoting a public hearing regarding community development needs was published in Spanish in the January 19, 2014 edition of *La Prensa*, a newspaper serving the Spanish speaking members of the community, in the *Commercial Appeal* on January 17, 2014, in the *Germantown News* on January 22, 2014, and in the *Bartlett Express*, *Collierville Herald*, and *Millington Star* on January 23, 2104. Copies of the notices are shown below. A public hearing on community development needs was held on February 5, 2014. No one attended this hearing aside from two SCDH staff members.

5. Summary of public comments

Two comments were received during the 30 day public review period from April 1, 2014 through April 30, 2014. A summary of these comments as well as SCDH's responses to those comments is attached.

6. Summary of comments or views not accepted and the reasons for not accepting them

SCDH did not reject any comments.

7. Summary

If current funding remains constant, SCDH anticipates receiving \$5,150,000 in CDBG funds and \$1,465,370 in HOME funds to address high priority needs during the 5-Year Strategy period. By addressing these needs, SCDH will advance the goals to preserve the existing housing stock and create opportunities for affordable and fair housing, reduce the harmful affects of lead-based paint, and improve communities in Shelby County. During the first year of the 5-Year Strategy period, as described in the One Year Action Plan for the period of July 1, 2014 through June 30, 2015, SCDH will utilize these CDBG and HOME resources to accomplish the following:

1. Rehabilitation of 20 homes including 5 with accessibility modifications for residents with special needs,
2. Creation of 24 lead-safe housing units,
3. Acquisition of one unit to create an affordable housing opportunity, and
4. Completion of one or more non-housing community development projects.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	SHELBY COUNTY	
CDBG Administrator	SHELBY COUNTY	Department of Housing
HOPWA Administrator		
HOME Administrator	SHELBY COUNTY	Department of Housing
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

SCDH served as the lead agency responsible for preparing this 5 Year Strategy and Annual Plan and is also the major public agency responsible for administering all CDBG and HOME assisted programs covered by this 5 Year Strategy. SCDH will be advised by the Urban County Consortium and will be under the direct authority of the Mayor of Shelby County, who will have final approval for all expenditures. The Urban County Consortium is composed of the Mayor of Shelby County and the Mayors of the six Entitlement Area municipalities (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington), or their respective designee.

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

SCDH has taken steps to enhance coordination with public and assisted housing providers, providers of services for the nonhomeless having special needs, the Continuum of Care, and Urban County Consortium members.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

SCDH coordinated with all municipalities in the Urban County Consortium (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington) in preparing the 5 Year Strategy. SCDH relied upon information and input from a wide range of housing providers and health/mental health agencies, especially for drafting the needs assessment, including The Community Alliance for the Homeless, The City of Memphis Division of Housing and Community Development, the Plough Foundation, the Memphis Mental Health Institute, and the Shelby County Health Department Ryan White Program.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Information provided by the Community Alliance for the Homeless was used for the homeless special needs section of the Needs Assessment, and the Alliance was asked to review and comment on the initial draft of this section in the Needs Assessment.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Shelby County is not a recipient of ESG funds and therefore did not consult with the Continuum(s) of Care to determine how to allocate ESG funds, determine performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Plough Foundation
	Agency/Group/Organization Type	Foundation Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Information provided by the Plough Foundation was used to inform the non-homeless special needs section of the Needs Assessment, and the Plough Foundation was asked to review and comment on the initial draft of this section in the Needs Assessment. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
2	Agency/Group/Organization	Shelby County (Health Department)
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Information provided by the Shelby County Health Department Ryan White Program staff was used to inform the non-homeless special needs section of the Needs Assessment, and was asked to review and comment on the initial draft of this section in the Needs Assessment. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
3	Agency/Group/Organization	ARLINGTON
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, the Town of Arlington was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
4	Agency/Group/Organization	BARTLETT
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, the Town of Bartlett was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
5	Agency/Group/Organization	COLLIERVILLE
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, the Town of Collierville was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
6	Agency/Group/Organization	Germantown
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, the City of Germantown was invited to be engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
7	Agency/Group/Organization	Lakeland
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, the City of Lakeland was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs.
8	Agency/Group/Organization	MILLINGTON
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	As a member of the Urban County Consortium, the City of Millington was engaged in all aspects of the planning process, particularly by identifying and prioritizing non-housing community development needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
9	Agency/Group/Organization	Community Alliance for the Homeless
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Information provided by the Community Alliance for the Homeless was used to inform the homeless special needs section of the Needs Assessment, and the Alliance was asked to review and comment on the initial draft of this section in the Needs Assessment. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
10	Agency/Group/Organization	Memphis Mental Health Institute
	Agency/Group/Organization Type	Services - Person with Mental Illnesses
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Memphis Mental Health Institute was provided input to inform the nonhomeless special needs section of the Needs Assessment.
11	Agency/Group/Organization	Case Management, Inc.
	Agency/Group/Organization Type	Services - Mentally Ill
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Draft for Public Review

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Case Management was asked to provide input to inform the nonhomeless special needs section of the Needs Assessment but did not respond to an email request to do so. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
12	Agency/Group/Organization	Family Safety Center of Memphis and Shelby County
	Agency/Group/Organization Type	Sevices - Domestic Violence Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Family Safety Center of Memphis and Shelby County data for estimating the housing needs of victims of domestic violence. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
13	Agency/Group/Organization	Millington Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Millington Housing Authority (MiLLHA) provided input to inform the public housing section of the Needs Assessment, Market Analysis, Strategic Plan and Annual Action Plan. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
14	Agency/Group/Organization	Community Development Council of Greater Memphis
	Agency/Group/Organization Type	Association of Community Development Corporations
	What section of the Plan was addressed by Consultation?	Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
15	Agency/Group/Organization	Memphis and Shelby County Office of Sustainability
	Agency/Group/Organization Type	Other government - County Other government - Local
	What section of the Plan was addressed by Consultation?	Draft for Public Review

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
16	Agency/Group/Organization	Memphis and Shelby County Office of Planning and Development
	Agency/Group/Organization Type	Other government - County Other government - Local
	What section of the Plan was addressed by Consultation?	Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
17	Agency/Group/Organization	Shelby County Division of Community Services
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
18	Agency/Group/Organization	Shelby County Office of Construction Code Enforcement
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Information provided by the Office of Construction Code Enforcement was used to inform the housing needs section of the Needs Assessment. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
19	Agency/Group/Organization	Memphis Area Legals Services Memphis Fair Housing Center
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Draft for Public Review

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment and asked to assist with fair housing outreach.
20	Agency/Group/Organization	Bartlett Family Assistance Commision
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization was provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
21	Agency/Group/Organization	MH Consulting, LLC
	Agency/Group/Organization Type	to the Plough Foundation
	What section of the Plan was addressed by Consultation?	Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	MH Consulting has been retained by the Plough Foundation, a Memphis based family foundation, to lead the program design and implementation plan for their county-wide Aging in Place initiative and was provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
22	Agency/Group/Organization	Memphis Urban Area Metropolitan Planning Organization (Memphis MPO)
	Agency/Group/Organization Type	Other government - County Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Draft for Public Review
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Memphis MPO staff were provied the draft 5 Year Strategy and Annual Plan for review and comment, and the draft was in trun distributed to 490 contacts on the MPO's mailing list of primary stakeholders and interested citizens.

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

No relevant agencies providing services in the Entitlement Area jurisdiction were identified and deliberately not consulted in the preparation of this plan.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Community Alliance for the Homeless	SCDH does not receive direct funding for homelessness prevention. however, Shelby County Government supports the efforts of the Community Alliance for the Homeless in partnership with the.
Memphis Urban Area Long Range Transportation Plan	The Memphis Urban Area Metropolitan Planning Organization (Memphis MPO)	Board members and staff of the Memphis MPO were provided copies of the draft 5 Year Strategy and Annual Plan for review and comment. The LRTP goals appear to be compatible with the 5 Year Strategy goals.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Coordination with local units of government, particularly the six municipal members of the Urban County Consortium, are detailed in the above table of organizations consulted.

PR-15 Citizen Participation

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Efforts to solicit citizen participation during preparation of the plan included several newspaper notices advertising public hearing, including a hearing to gain input on housing and community development needs. Additionally, the Urban County Consortium (UCC) was engaged in all stages of the planning process. Composed of representatives from all jurisdictions in the urban county entitlement area, the UCC was well positioned to identify housing and community development needs in the urban county in order to shape the goals for the 5 Year Strategy.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Urban County Consortium Meeting	Urban County Consortium members	Meeting held on May 15, 2013. 7 consortium members attended as well as SCDH staff. Planning process was discussed and members were asked to begin identifying and prioritizing community development needs.	Comments included an offer by the SCDH Administrator to meet with individual consortium members as necessary to discuss eligible activities and national objectives as they might relate to addressing high priority community development needs.	No comments were rejected.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Urban County Consortium Meeting	Urban County Consortium members	Meeting held on May 15, 2013. 7 consortium members attended as well as SCDH. Meeting was held on November 6, 2013. Seven consortium members attended as well as SCDH staff. Status of the planning process was discussed, including preliminary findings from the Needs Assessment and Market Analysis.	Comments included an offer by the SCDH Administrator to meet with individual consortium members as necessary to discuss eligible activities and national objectives as they might relate to addressing high priority community development needs.	No comments were rejected.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing published in the Commercial Appeal on 1/17/2014	
4	Newspaper Ad	Non-English Speaking - Specify other language: Spanish	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing published in LaPrensa on 1/19/2014	
5	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing published in the Germantown News on 1/22/2014	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing published in the Bartlett Express on 1/23/2014	
7	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing published in the Collierville Herald on 1/23/2014	
8	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing published in the Millington Star on 1/23/2014	
9	Public Hearing	Non-targeted/broad community	No one attended other than two SCDH staff members.	No comments were received.	Not applicable/No comments were received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing and comment period published in the Commercial Appeal on 4/1/2014	
11	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing and comment period published in the Germantown News on 4/2/2014	
12	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing and comment period published in the Bartlett Express on 4/3/2014	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
13	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing and comment period published in the Collierville Herald on 4/3/2014	
14	Newspaper Ad	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing and comment period published in the Millington Star on 4/3/2014	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
15	Urban County Consortium Meeting	Urban County Consortium members	An Urban County Consortium Meeting was held on April 9, 2014. Five consortium members attended as well as SCDH staff. PY2014 allocation and project recommendations were discussed.	There were no objections to the recommended Annual Plan project expenditures for the PY2014 Annual Plan.	No comments were rejected.	
16	Internet Outreach	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - The Draft 5-Year Strategy and Annual Plan were placed on the SCDH website for public review and comment during the 30 day public review period.	http://shelbycountyttn.gov/DocumentCenter/View/17252

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
17	Internet Outreach	Non-targeted/broad community	Not Applicable	Not Applicable	Not Applicable - The Draft 5-Year Strategy and Annual Plan were placed on the SCDH website for public review and comment during the 30 day public review period.	http://shelbycountyttn.gov/DocumentCenter/View/17254

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
18	Internet Outreach	Non-English Speaking - Specify other language: Spanish	Not Applicable	Not Applicable	A Spanish language translation of the Public Notice regarding the Draft 5-Year Strategy and Not Applicable - Annual Plan as well as associated public hearings was placed on the SCDH website for public review and comment during the 30 day public review period.	http://shelbycountyttn.gov/DocumentCenter/View/17253

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
19	Newspaper Ad	Minorities	Not Applicable	Not Applicable	Not Applicable - Public Notice promoting public hearing and comment period published in the Tri-State Defender (a newspaper serving the area African American community) on 4/10/2014.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
20	Public Hearing	Non-targeted/broad community	Public Hearing held at 5.p. on 4/15/2014 at Bartlett City Hall. Two SCDH staff members and one staff member from the City of Bartlett Department of Engineering were in attendance.	No comments were received.	No comments were rejected.	
21	Public Meeting	Non-targeted/broad community	Public Hearing held at 5.p. on 4/22/2014 at SCDH. Two SCDH staff members were in attendance.	No comments were received.	No comments were received.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Affordable housing is the most pressing housing need in the Shelby County Urban County Entitlement Area. The racial and ethnic groups most affected by housing problems are Black/African American households. The most common housing problems are households having cost burdens greater than 30% of household income as well as households having cost burdens greater than 50%.

Households in the Shelby County Department of Housing's jurisdiction with one or more housing problems are more likely to be Black/African American than any other racial or ethnic group, regardless of income level. Black/African American households are also more likely to have severe housing problems than the other racial or ethnic group households. In general, Black/African American households in Shelby County are additionally most impacted by housing cost burdens that range from less than 30% to greater than 50% of the household income.

According to 2006-2010 American Community Survey estimates, low-to moderate-income Black/African American households are concentrated in unincorporated Shelby County; the Northaven community, the Millington Reserve area near Austin Peay Highway and the Memphis reserve area near Collierville, south of Germantown.

The 44 unit Kefauver Terrace public housing complex in Bartlett is operated by the Memphis Housing Authority. The Millington Housing Authority (MillHA) manages 89 public housing units. Public housing tenants, like many low-income persons, need better access to resources such as employment, social, and human services. Additionally, some tenants have a need for senior services. Ramps are a common accommodation request of tenants and applicants on the MillHA waiting list. The amount of people on the MillHA waiting list is indicative of the need for more affordable housing in Shelby County.

The majority of the homeless population in the Memphis and Shelby County area is Black/African American according to Memphis-Shelby County Continuum of Care 2013 estimates and data. The issue of homelessness in Shelby County is being addressed largely by the Memphis and Shelby County Action Plan to End Homelessness and the Memphis-Shelby County Continuum of Care. So far successful, this effort has coordinated resources and services to reduce the number of people who experience homelessness in the community. Although much of the homeless population is sheltered and the rate of homelessness is on the decline, this data shows that there is still a need for affordable housing in Shelby County.

The non-homeless special needs population in Shelby County includes individuals such as the elderly and frail elderly, severe mentally ill, developmentally disabled and the physically disabled. Those that suffer from substance abuse issues, living with HIV/AIDS, and victims of domestic violence are also included in this population. Due to the complexity of these issues, some members of the special needs population have more than one of these issues. SCDH does not receive funding to directly help the special needs population, although the elderly, frail elderly and the physically disabled will continue to be a priority for Shelby County.

Non-housing community development needs identified within the Urban County include sidewalk improvements, flood drainage improvements, water/sewer improvements, and street improvements.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The most significant housing need in Shelby County is affordable housing for renters and homeowners. Other housing issues in this jurisdiction include substandard housing and overcrowding which affects more renters than owners. Non-housing issues such as unstable employment and unemployment also likely affect local housing needs.

The racial and ethnic groups most affected by housing problems are Black/African American households, Asian households and Hispanic households. As displayed in the maps included in the section below, 2006-2010 American Community Survey estimates indicate that Black/African American households are concentrated in unincorporated Shelby County and mainly consistent with low-and moderate-income census tracts in the jurisdiction.

Demographics	Base Year: 2000	Most Recent Year: 2009	% Change
Population	218,499	239,134	9%
Households	80,202	83,998	5%
Median Income	\$39,593.00	\$0.00	-100%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2005-2009 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	3,759	4,060	7,835	6,480	
Small Family Households *	1,475	1,374	3,800	41,095	
Large Family Households *	214	414	679	6,875	
Household contains at least one person 62-74 years of age	655	814	1,453	1,231	8,608
Household contains at least one person age 75 or older	448	803	920	640	3,247
Households with one or more children 6 years old or younger *	888	774	1,949	12,038	
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2005-2009 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	10	20	10	0	40	20	0	20	25	65
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	10	0	0	10	0	0	4	0	4
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	50	125	75	20	270	0	30	98	10	138
Housing cost burden greater than 50% of income (and none of the above problems)	1,279	805	195	85	2,364	1,605	1,215	1,770	659	5,249

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	70	510	1,350	505	2,435	105	494	1,819	1,720	4,138
Zero/negative Income (and none of the above problems)	115	0	0	0	115	173	0	0	0	173

Table 7 – Housing Problems Table

Data 2005-2009 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,334	955	280	105	2,674	1,625	1,240	1,895	694	5,454
Having none of four housing problems	309	860	2,030	1,505	4,704	205	1,015	3,630	4,170	9,020
Household has negative income, but none of the other housing problems	115	0	0	0	115	173	0	0	0	173

Table 8 – Housing Problems 2

Data 2005-2009 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	650	545	915	2,110	595	529	2,033	3,157
Large Related	164	164	115	443	35	184	313	532
Elderly	228	275	104	607	635	715	799	2,149
Other	365	435	490	1,290	470	292	513	1,275
Total need by income	1,407	1,419	1,624	4,450	1,735	1,720	3,658	7,113

Table 9 – Cost Burden > 30%

Data 2005-2009 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	650	300	110	1,060	585	449	1,093	2,127
Large Related	149	94	0	243	35	139	185	359
Elderly	198	190	35	423	540	383	350	1,273
Other	340	265	55	660	460	242	189	891
Total need by income	1,337	849	200	2,386	1,620	1,213	1,817	4,650

Table 10 – Cost Burden > 50%

Data 2005-2009 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	50	125	45	20	240	0	10	25	10	45
Multiple, unrelated family households	0	4	30	0	34	0	20	77	0	97
Other, non-family households	0	0	0	0	0	0	0	0	0	0

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Total need by income	50	129	75	20	274	0	30	102	10	142

Table 11 – Crowding Information – 1/2

Data Source: 2005-2009 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source:
Comments:

Describe the number and type of single person households in need of housing assistance.

According to 2012 ACS data, there are an estimated 19,438 single person (i.e. non-family) households in the jurisdiction. This estimate combined with 2005-2009 CHAS data on cost burden, can be used to describe number and type of single person households in need of housing assistance. Assuming that costs burden greater than 30% indicates and need for housing assistance, and assuming single person households mirror overall households with respect to cost burden by race, it is estimated that there are 11, 857 single person households in need of housing assistance and that 3,557 of these single individuals are African American and many may also be elderly householders.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to 2012 ACS data, there are an estimated 23,894 noninstitutionalized civilians with a disability living in the jurisdiction. This estimate combined with 2005-2009 CHAS data on cost burden can be used to estimate the number of those in need of housing assistance. Assuming that costs burden greater than 30% indicates a need for housing assistance, and assuming single person households mirror overall households with respect to cost burden by race, it is estimated that there are 14,475 noninstitutionalized civilians with a disability needing housing assistance. Many of these disabled individuals in need of housing assistance may be elderly.

The Shelby County Crime Victims Center tracks call counts by type. Data on such call counts by type was provided for fiscal July 2010 through July 2013. According to this data, of the 384 calls received during the period, at least 294 of the 384 calls (77%) included a request for shelter assistance. This averages

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approximately 100 requests per year. Assuming this approximate average represents a typical year and that none of the call counts include duplicate callers by repeat victims, it is estimated that at least 100 people each year are victims of domestic violence, dating violence, sexual assault and stalking who are in need of housing assistance in the form of immediate safe shelter.

What are the most common housing problems?

According to the CHAS data represented in the above tables, the most common housing problems are households having cost burdens greater than 30% of household income as well as households having cost burdens greater than 50%. Another common problem is overcrowding in single-family households. Many of these victims in need of housing assistance may have minor children in their care.

Are any populations/household types more affected than others by these problems?

Small related households, renters and owners, are more affected by the problem of cost burdens greater than 30% of the household income and the greater than 50% cost burden. Single-family households that are renters and multiple, unrelated families that are owners are more impacted by the issue of crowding than the other household types.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Higher levels of education are associated with a greater likelihood of employment and well-paid jobs, contributing to improved financial stability. Low-income families and families with children likely have employment issues, lower rates of educational attainment and are less financially stable. These groups of people; who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered need support services and networks that will connect them with information and resources to enhance their stability. According to the Community Alliance for Homelessness, those that are formerly homeless need intensive, home-based support to ensure that these individuals can successfully live independently. Services that address mental health concerns and behavioral health needs such as substance abuse are also important. All 72 people who were housed between October 2012 and May 2013 through the 100K Homes Memphis/Shelby County Initiative cited mental health issues and substance abuse during their homelessness. It is logical that formerly homeless families and individuals will need services that include mental health and substance abuse counseling, vocational training and daily living support.

Source: 100K Homes/Memphis 100 Progress Report

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Although there is no estimate of the at-risk population, it is worth noting that the Housing Hotline at Tennessee Community Service Association (TNCSA) receives an average of 1,800 calls per month.

Source: Community Alliance for Homelessness- Gaps Analysis briefing Paper

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Although no specific housing characteristics have been explicitly linked with instability and an increased risk of homelessness in Shelby County, there are some factors that likely can be attributed to an increased risk. Some risk factors include sudden loss of or lack of gainful employment, substance abuse, or a cost burden greater than 30% of household income.

Discussion

Affordable housing is the most pressing housing need in the Shelby County jurisdiction. Cost burden and extreme cost burden are the most common housing problems across all low- income households, both renter and owner. Overcrowding is also a common problem in some low-income households. There is some concern about lack of complete plumbing and kitchen facilities, but these conditions are not widespread.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Households in the Shelby County Department of Housing's jurisdiction with one or more housing problems are more likely to be Black/African American than any other racial or ethnic group, regardless of income level.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	39,730	4,845	5,115
White	8,105	1,025	1,320
Black / African American	29,250	3,655	3,430
Asian	460	50	100
American Indian, Alaska Native	120	10	45
Pacific Islander	45	0	0
Hispanic	1,285	60	165

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	33,610	8,200	0
White	9,125	2,920	0
Black / African American	22,275	4,830	0
Asian	350	65	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	10	30	0
Pacific Islander	0	0	0
Hispanic	1,655	175	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	32,500	24,010	0
White	10,510	8,635	0
Black / African American	19,485	13,310	0
Asian	705	265	0
American Indian, Alaska Native	75	90	0
Pacific Islander	0	0	0
Hispanic	1,430	1,495	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,905	22,585	0
White	4,800	9,570	0
Black / African American	5,395	11,480	0
Asian	210	435	0
American Indian, Alaska Native	0	50	0
Pacific Islander	0	0	0
Hispanic	375	775	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

In the 0%-30% range of area median-income, Black/African American households make up 73.6% of the households with one or more of the four housing problems.

Pacific Islander households in this category have a disproportionately greater need due to housing problems in comparison to the category as a whole, approximately 20% higher than the need of the group. This is a disproportionate representation as all of the Pacific Islander households in the Shelby County jurisdiction have 1 or more housing problems and are in the 0%-30% AMI range. Due to the lack of representation of Pacific Islander households across the various AMI ranges, it is likely that this need is inflated. In the 30%-50% range, 66.3% of households with 1 or more problems are Black/African American households.

Hispanics have a disproportionately higher need due to housing problems than other racial or ethnic groups in the 30%-50% AMI range. This is a fair representation as the population of Hispanics is distributed proportionately across the different AMI ranges.

In the 50%-80% range, 60% of the households with one or more problems are Black/African American households.

Asians also have a disproportionately greater need due to housing problems, approximately 15.2% point higher, than the total jurisdiction that is in the 50%-80% AMI.

Of the households in the 80%-100% AMI range, 49.5% of households with one or more problems are Black/African American households.

Although Black/African American households do not have a disproportionately greater need due to housing problems according to definition for this purpose, there is a slightly greater need than that of the whole jurisdiction at the 0%-30%, 30%-50% and the 50%-80% AMI ranges that is worth noting. In the 30%-50% range, 66.3% of households with 1 or more problem are Black/African American. Hispanics have a disproportionately higher need due to housing problems than other racial or ethnic groups in the 30%-50% AMI range. This is a fair representation as the population of Hispanics is distributed proportionately across the different AMI ranges.

In the 50%-80% range, 60% of the households with one or more problems are Black/African American. Asians have a disproportionately greater need due to housing problems, approximately 15.2% point higher, higher than the total jurisdiction that is in the 50%-80% AMI.

Of the households in the 80%-100% AMI range, 49.5% of households with one or more problems are Black/African American.

Although Black/African American households do not have a disproportionately greater need according to definition for this purpose, there is a slightly greater need due to housing problems than that of the whole jurisdiction at the 0%-30%, 30%-50% and the 50%-80% AMI ranges that is worth noting.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Similar to housing problem statistics, Black/African American households are also more likely to have severe housing problems than the other racial or ethnic group households. Black/African American households account for approximately 70% of all low- to moderate-income households with a severe housing problem.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	35,415	9,160	5,115
White	7,025	2,105	1,320
Black / African American	26,205	6,700	3,430
Asian	405	105	100
American Indian, Alaska Native	120	10	45
Pacific Islander	45	0	0
Hispanic	1,165	180	165

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	19,055	22,760	0
White	5,070	6,980	0
Black / African American	12,845	14,260	0
Asian	190	235	0
American Indian, Alaska Native	10	30	0
Pacific Islander	0	0	0
Hispanic	810	1,025	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,310	47,205	0
White	3,085	16,060	0
Black / African American	5,450	27,345	0
Asian	245	730	0
American Indian, Alaska Native	15	150	0
Pacific Islander	0	0	0
Hispanic	455	2,470	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,630	30,860	0
White	1,175	13,190	0
Black / African American	1,250	15,620	0
Asian	65	580	0
American Indian, Alaska Native	0	50	0
Pacific Islander	0	0	0
Hispanic	110	1,035	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Black/African Americans households make up 74% of the households in the 0%-30% area median income range that have severe household problems. Pacific Islander households in this category have a disproportionately greater need in comparison to the category as a whole; approximately 20% higher than the need of the group. Likewise with the housing issue statistic, this statistic is misrepresentative as all of the Pacific Islander households in the Shelby County jurisdiction have 1 or more severe housing problems and are in the 0%-30% AMI range. Due to the lack of representation of Pacific Islander households across the various AMI ranges, it is likely that this need is inflated.

In the 30%-50% range, 67.4% of the households with severe problems are Black/African American households. Hispanics in the 30%-50% range have a disproportionately greater need in comparison to the jurisdiction as a whole; the rate of severe problem incidences is approximately 36.7% points higher than the incidence of the jurisdiction as a whole.

In the 50%-80% range, 59% of the households with severe problems are Black/African American households. Asians do not have a disproportionately greater need than other racial or ethnic group households in the 50%-80% AMI range, but the rate of housing problem incidences is approximately 8.7% greater than the total jurisdiction. Also, the rate of their need is between 16-9% greater than the rates of the other individual groups in this AMI range.

In the 80%-100% range, 48% of the households with severe problems are Black/African American households.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

In general, Black/African American households in Shelby County are most impacted by housing cost burdens that range from less than 30% to greater 50% of the household income.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	209,845	66,275	62,665	5,310
White	115,470	25,075	17,075	1,320
Black / African American	81,380	36,585	42,110	3,610
Asian	4,420	1,190	800	100
American Indian, Alaska Native	380	95	145	45
Pacific Islander	165	0	45	0
Hispanic	5,965	2,665	1,875	165

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2005-2009 CHAS

Discussion:

In the 30-50% category of the cost burdened population, Black/African American households are more than half of the cost burdened households, 55.2%, of the total while they only account for 47.6% of the total jurisdiction. In the greater than 50% category, Black/African American households account for approximately 67% of the total, more than double the amount of similarly burdened White households.

Although White households make up 55% of the burdened households in the fewer than 30% category, generally as the housing cost burden increases, the percentage of White households affected decreases as the percentage of the burdened Black/African American households increases. Similar with their marginal representation, the non-White and non-Black/African American racial and ethnic groups account for a small fraction of the burdened population in each category; the highest percentage being 4% of Hispanic households in the 30-50% category.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Households in the Shelby County jurisdiction with one or more housing problems are more likely to be Black/African American households than any other racial or ethnic group. Although Black/African American households do not have a disproportionately greater need, there is a slightly greater need than that of the whole jurisdiction at the 0%-30%, 30%-50% and the 50%-80% AMI ranges that is worth noting.

Pacific Islander households in the 0%-30% AMI category have a disproportionately greater need in comparison to the category as a whole; approximately 20% higher than the need of the group. Due to the lack of representation of Pacific Islander households across the various AMI ranges, it is likely that this need is overestimated.

In the instance of housing and severe housing problems, Hispanic households have a disproportionately higher need than other racial or ethnic groups in the 30%-50% AMI range.

In regards to housing problems, Asian households in the 50%-80% AMI category have a disproportionately greater need which is approximately 15.2% points higher than the total jurisdiction. When considering severe housing problems, Asians do not have a disproportionately greater need than other racial or ethnic group households in the 50%-80% AMI range. But, the rate of housing problem incidences is approximately 8.7% greater than the total jurisdiction.

Similar to housing problem statistics, Black/African Americans are also more likely to have severe housing problems. Black/African Americans account for approximately 70% of all low-to moderate-income households with a severe housing problem.

If they have needs not identified above, what are those needs?

No other housing needs have been identified for low-to moderate-income minority households.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

As mentioned in the Summary of Housing Needs, according to 2006-2010 American Community Survey estimates, low-to moderate-income Black/African American households are concentrated in unincorporated Shelby County; the Northaven community, the Millington Reserve area near Austin Peay Highway and the Memphis reserve area near Collierville, south of Germantown.

NA-35 Public Housing – 91.205(b)

Introduction

Public housing in the Shelby County jurisdiction has seen significant changes since 2008. The Horton Gardens complex which was operated by the Shelby County Housing Authority (SCHA) closed in 2008. The complex located in unincorporated Shelby County had a total of 131 units and upon its closing the SCHA issued housing choice vouchers to the remaining families. In 2012 the Kefauver Terrace complex in Bartlett was transferred to the Memphis Housing Authority. This 44 unit complex was home to mainly elderly and disabled residents. Later in 2012 the Shelby County Housing Authority was closed due to inefficiencies such as mismanagement of funds and administrative oversights. These changes reduced the amount of available public housing in the Shelby County jurisdiction from 264 units to 89 units which are operated by the Millington Housing Authority (MillHA).

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	89	0	0	0	0	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Certificate	Mod-Rehab	Public Housing	Program Type				
				Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	13,686	0	0	0	0	0
Average length of stay	0	0	9	0	0	0	0	0
Average Household size	0	0	2	0	0	0	0	0

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	4	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	20	0	0	0	0	0
# of Disabled Families	0	0	15	0	0	0	0	0
# of Families requesting accessibility features	0	0	89	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	25	0	0	0	0	0	0
Black/African American	0	0	62	0	0	0	0	0	0
Asian	0	0	1	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	1	0	0	0	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	0	0	0	0	0	0
Not Hispanic	0	0	89	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Millington Housing Authority tenants, like many low-income persons, need better access to resources such as employment, social, and human services. Additionally, some tenants have a need for senior services. Ramps are a common accommodation request of tenants and applicants on the MillHA waiting list.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

There are 29 families on the MillHA waiting list for the following types of units: 5- 1 bedroom, 14- 2 bedroom, 5- 3 bedroom, 5- 4 bedroom, and 0- 5 bedroom. The average wait time on the waiting list depends on the bedroom size and can range from 3 months to seven years. Based on information provided by the MillHA Executive Director, the most pressing need of the tenants is better access to resources. This is consistent with previously mentioned needs of the homeless and non-homeless special needs population the Urban County. These groups need better access to knowledge that will help improve their social and economic situation. Such a service could be provided through a social worker that periodically visits tenants. The MillHA has a Resident Advisory Board that provides insight into tenant needs and currently residents have expressed a desire for storage cabinets in bathrooms, but no pressing needs have been communicated.

How do these needs compare to the housing needs of the population at large

The general needs of the MillHA tenants are more severe than those of the Shelby County population at large. The median income in the Shelby County jurisdiction is \$39,593 while the average annual income of MillHA tenants is \$13,686. As indicated by the severely low annual income of MillHA tenants and the observations of MillHA administrators, these people have a pressing need for resources and services that will improve their stability. Just as there are formerly homeless people, disabled families and families who need in-home accessibility features to live comfortably in Shelby County, those populations are also present in the public housing subpopulation. The MillHA has experienced an increased demand for housing and with the growing population in Shelby County that is something that is also occurring locally as well as nationally. The needs of the MillHA tenants are similar to the needs of other low-and moderate-income households and at-risk populations in the Urban County; access to resources to improve ability to live a stable life.

Discussion

It is not known whether or not the Millington Housing Authority serves any tenants who were displaced by the closing of the Horton Gardens Complex, but the MillHA has experienced an increased demand for public housing. The tenants do not have any reported pressing needs but there is a clear indication that these persons would benefit from services and information to increase their social and economic

stability. The amount of people on the MillHA waiting list and the average wait time is also an indication that there is a need for more affordable housing in Shelby County.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

In preparing this Homeless Needs Assessment, SCDH consulted with the Community Alliance for the Homeless (particularly Katie Kitchin, Executive Director) and examined Memphis-Shelby County Continuum of Care data and estimates as of 2013.

In 2011, the Mayors of the City of Memphis and Shelby County initiated the Action Plan to End Homelessness. This strategic effort to reduce the number of people who experience homelessness employs evidence-based practices in addition to realigning existing and newly created resources. Since the implementation of this plan, there has been a 13% reduction of homelessness in the Memphis and Shelby County area.

In January 2013, Memphis and Shelby County volunteers counted 1,816 people who met HUD's definition of literally homeless. This is a decrease of 13% over the previous year.

It is difficult to calculate the homeless population in the Shelby County jurisdiction alone. Although the homeless population is spread throughout Shelby County, the population is most often visible in the Downtown and Midtown areas of the Memphis with pockets of encampments in at least four other parts of the County. Virtually all services available to the homeless population are located within the City of Memphis. The homeless individuals and families in the Entitlement Area seek those services located in the City of Memphis.

In nearly every category of the Point-In-Time Count of Homeless People, homelessness fell in 2013. There were fewer single individuals, fewer individuals sheltered, fewer unsheltered, and fewer people in families who were literally homeless on January 22nd, 2013. Only the number of families increased slightly (216 vs. 214 in 2012.) Proportionately, the rate of unsheltered persons who had been homeless less than six months was the same (17.6% in 2013 vs. 17% in 2012) though the overall number was much smaller (22 in 2013 vs. 55 in 2012). The number of unsheltered individuals who reported extremely long homeless episodes (5 or more years) was 54 vs. 75 last year. Another sign of progress is that in 2013, there were no families sleeping unsheltered. There had been one unsheltered family reported during each of the previous two years.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	665	0	1,741	722	1,219	108
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	995	156	4,019	1,606	2,813	67
Chronically Homeless Individuals	182	117	450	121	175	3,285
Chronically Homeless Families	12	0	53	5	10	734
Veterans	297	21	1,008	502	706	67
Unaccompanied Child	0	0	12	12	10	45
Persons with HIV	33	4	95	32	34	67

Table 26 - Homeless Needs Assessment

Data Source

Comments:

Indicate if the homeless population is:

Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Data for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) can be found in the table entitled "Homeless Needs Assessment".

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	971	44
Black or African American	4,628	96
Asian	11	1
American Indian or Alaska Native	3	1
Pacific Islander	30	1
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	50	11
Not Hispanic	5,706	145

Data Source

Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

According to estimates and actual data collected by the Memphis-Shelby County Continuum of Care, in 2013 there are an estimated 665 families with children in need of housing assistance. 318 homeless veteran families in need were also documented. As mentioned previously, it is difficult to calculate the homeless population and subpopulations in the Shelby County jurisdiction alone. The many organizations that provide services to the homeless are located in Memphis and the Point in Time counts are conducted throughout all of Shelby County.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

As reflected in the table entitled "Nature and Extent of Homelessness (Optional)", the majority of the homeless population in the Memphis and Shelby County area is Black/African American according to Memphis-Shelby County Continuum of Care 2013 estimates and data. The number of homeless

Black/African Americans is a little more than four and a half times the number of homeless Whites. Similar to their relatively small population in the Memphis-Shelby County Continuum of Care geographic area, Non-Black/African Americans minorities are a small fraction of the homeless population. There is a small Hispanic homeless population that is primarily made up of individuals with substance abuse and mental health disorders. They have a higher rate of unsheltered status than non-Hispanics. This is probably due to their residency status and programs that require or are believed to require proof of identity in order to access services.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The vast majority of the homeless population in the Memphis and Shelby County area, 98%, is sheltered. This is likely due to the numerous shelters and services that are coordinated through the Memphis-Shelby County Continuum of Care.

Homelessness in Memphis-Shelby County area is driven by the extremely low incomes of adults, combined with disconnectedness to appropriate systems of support (e.g. ranging from family and friend support to professional supports that promote physical and behavioral health.) On a per capita basis, the rate of homelessness in Memphis is low compared to other cities of its size. This can be attributed in part to the relatively low cost of housing in the area; the national average for rent is \$899 per month while the average in Memphis is \$711 per month. The unsheltered population ranges from around 200 in the winter months to 400 in warmer weather. Based on the Community Alliance for the Homeless vulnerability assessment process through which 100 volunteers conducted interviews with 259 unsheltered individuals, the unsheltered have high rates of substance abuse disorders (60%) and mental illness (50%).

Discussion:

The issue of homelessness in Shelby County is being addressed largely by the Memphis and Shelby County Action Plan to End Homelessness and the Memphis-Shelby County Continuum of Care. So far successful, this effort has coordinated resources and services to reduce the number of people who experience homelessness in the community. Although much of the homeless population is sheltered and the rate of homelessness is on the decline, this data shows that there is still a need for affordable housing in Shelby County.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

The non-homeless special needs population in Shelby County includes individuals such as the elderly and frail elderly, severe mentally ill, developmentally disabled and the physically disabled. Those that suffer from substance abuse issues, living with HIV/AIDS, and victims of domestic violence are also included in this population. Due to the complexity of these issues, some members of the special needs population have more than one of these issues.

Describe the characteristics of special needs populations in your community:

Frail Elderly. According to 2009 ACS estimates, 21,510 elderly individuals reside in the Entitlement Area and approximately 758 of them lived below the poverty level during the last 12 months. 2005-2009 CHAS data book information indicates 4,452 low-and moderate-income elderly households bear a 30% or greater cost burden.

In 2012, the Plough Foundation produced a report on older adults in Shelby County. 20% of 543 elderly surveyed expressed a need for major home repairs (structural repairs, bathroom modifications, better heating and cooling, installation of emergency response systems, and modifications such as ramps/rails to provide accessibility). In addition to the evident need for housing assistance, this group also needs more information regarding available support services. 25% expressed that they “do not know” where to go for support services information.

Severe Mental Illness. The National Alliance on Mental Illness reports nearly 246,000 adults and 66,000 children in Tennessee live with serious mental illness. If the Entitlement Area has an equal proportion of this population, about 9,489 adults and 2,571 children with such issues live in the jurisdiction. The “CMHS Uniform Reporting System: 2012 State Report” indicated 212,200 individuals were served by the State Mental Health Authority and 79% lived in private residences. Others were living in foster homes, residential care, crisis residence, children’s residential treatment centers, institutional settings, jail/correctional facilities, or were homeless/in shelters. As part of the Mayor’s Action Plan to End Homelessness, Shelby County joined the 100,000 Homes Campaign - a national effort to provide housing for the most vulnerable unsheltered individuals who will likely die without intervention. During the initial stages of the campaign, 259 individuals interviewed in Shelby County were sleeping unsheltered. Over half of them reported a serious mental disorder.

Substance Abuse. Over 1/2 of the unsheltered individuals interviewed in Shelby County reported a co-occurring substance abuse disorder.

Developmentally Disabled. Census data does not report the developmentally disabled, but 2007 American Community Survey data provides estimates of those with self-care disabilities. If those with

self-care disabilities are developmentally disabled, about 6,175 residents of the Entitlement Area are developmentally disabled.

Physically Disabled. The 2012 American Community Survey indicates 30,846 residents in the Shelby County Jurisdiction have an ambulatory, self-care or independent living disability.

Persons with HIV/AIDS. The Tennessee Department of Health reports that 25,658 individuals were living with HIV in Tennessee in 2012 - an increase of 923 people from 2011 - 7,026 individuals were living with HIV in the Memphis/Shelby County area.

Domestic Violence. During FY10-11, the Tennessee Department of Health reported 32 instances of domestic violence in Shelby County. All of the victims were female. Due to limitations of the Department of Health's reporting system and the reluctance of victims to report domestic violence to law enforcement, this data does not reflect the actual magnitude of the issue. In 2011, the Memphis Police Department reviewed 23,696 cases of domestic violence. Most research suggests that as few as one in ten assaults are reported, so there could be as many as 236,960 domestic violence assaults annually in Shelby County. If Entitlement Area has an equal proportion of this population, each case is a separate individual, and adjusting for unreported incidents, there are an estimated 2,339 such victims in the entitlement area.

What are the housing and supportive service needs of these populations and how are these needs determined?

For the elderly and frail elderly, physically disabled and the developmentally disabled, these populations may need in-home accommodations to live comfortably. Such accommodations for the physically disabled have included the following: wheelchair ramps both exterior and interior and in extreme cases provided a wheelchair lift; widened doors; lowered light switches and thermostats; provided tub rails; installed accessible toilets; changed vanity cabinets to wall hung sinks; lowered mirrors; modified cabinets; lowered closet runs; replaced carpet with vinyl; eliminated bathtubs and put in assessable showers; replaced door knobs with lever handles; and provided keyless entries.

According to the 2012 Memphis Transitional Grant Area Ryan White Needs Assessment, unmet support service needs for persons living with HIV/AIDS (PLWHA) include housing services, utility assistance, support groups, food pantry, non-medical case management, medical transportation services, treatment adherence counseling, respite, and alcohol/drug residential treatment. When comparing unmet needs of the PLWHA population in 2009 and 2012, the assessment found that housing services and utility assistance services were among the top two services needed by consumers in both instances. Persons with severe mental illness, substance abuse issues, and victims of domestic violence need support services to reduce their risk of homelessness in addition to services specific to their issues; rehabilitation, medication, counseling and case management, halfway houses, transportation, and employment services.

Through SCDH's Housing Rehabilitation Program, these in-home needs have primarily been determined on a case-by-case basis based upon evaluation of the unit and consultation with the homeowner by the assigned SCDH Site Inspector.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

At the end of 2011, it was estimated there were 7,856 persons living with HIV/AIDS (PLWHA) within the Eligible Metropolitan Statistical Area. According to the 2012 Memphis Transitional Grant (TGA) Area Ryan White Needs Assessment, approximately 90% of all PLWHA reside in Shelby County. Forty-eight per cent (48%), or 3,771 were living with AIDS, while 52 per cent (52%), or 4,085 were living with HIV. The overall percentage of persons living with AIDS has increased. In 2007 there was 44% (or 2,807) PLWHA and 56% (or 3,552) were living with HIV. Almost 69% of PLWHA in the Memphis TGA are male. A majority were non-Hispanic Black (82%), followed by 15% non-Hispanic White and 2% Hispanic. A higher percentage of females living with HIV/AIDS were non-Hispanic Black. At the end of 2011, almost 46% of PLWHA were above 45 years of age, an increase from 36% in 2009.

Discussion:

Shelby County Department of Housing recognizes that there are special needs populations in its jurisdiction. SCDH does not receive funding to directly help the special needs population. We rely on outside organizations that directly help those with special needs to refer those needing assistance in the way of housing rehabilitation or down-payment assistance.

SCDH assists in making owner-occupied housing safe and assessable for any person that meets the guidelines. We also will provide down-payment assistance for persons who qualify for the program. We will continue to work with outside agencies in coordinating referrals.

The elderly, frail elderly and the physically disabled will continue to be a priority for Shelby County, and SCDH will continue to provide safe housing for those owner-occupied homes that meet the guidelines. Shelby County Government provides services through the Memphis and Shelby County Domestic Violence Council and Shelby County Crime Victims Center. Other programs are available to help those needing supportive housing, and other supportive needs.

The Division of Alcohol and Drug Abuse Services, or the Tennessee Department of Mental Health and Developmental Disabilities serves as the single state authority for receiving and administering federal block grant funding from the U.S. Department of Health and Human Services, Substance Abuse and Mental Health Services Administration.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Within the Urban County there is a need for fire stations/equipment, youth centers, neighborhood facilities, parks and/or recreational facilities for children and parking facilities. Specifically, there is a need for parks or trails in Collierville and Lakeland and a basketball court in Collierville. These facilities will be an enhancement to the respective municipality and jurisdiction at large by providing safe places for citizens, particularly the youth and families with children, to congregate.

How were these needs determined?

The previously detailed needs were determined by consulting with the town managers, planners, or city engineers of the various municipalities that make up the Urban County. Each representative was asked to consider their respective community development needs in terms of public facilities. Based on the expressed priorities from the municipalities, general as well as specific needs throughout the jurisdiction were identified. Additionally, a public hearing (described in PR-15 Citizen Participation) was held on February 4, 2013 in an effort to solicit citizen input on community development needs.

Describe the jurisdiction's need for Public Improvements:

Within the Urban County there is a need for sidewalk improvements, flood drainage improvements, water/sewer improvements, and street improvements. Specifically, there is a need for park improvements including ADA park improvements in Bartlett, various sidewalk and ADA ramp improvements in Collierville, street improvements in Lakeland and Collierville, and flood drainage improvements in Arlington and Collierville.

How were these needs determined?

The previously detailed needs were determined by consulting with the town managers, planners, or city engineers of the various municipalities that make up the Urban County. Each representative was asked to consider their respective community development needs in terms of public improvements. Based on the expressed priorities from the municipalities, general as well as specific needs throughout the jurisdiction were identified. Additionally, a public hearing (described in PR-15 Citizen Participation) was held on February 4, 2013 in an effort to solicit citizen input on community development needs.

Describe the jurisdiction's need for Public Services:

Within the Urban County there is a need for youth services, senior citizen services, handicapped services, crime awareness and prevention services, employment training and neighborhood cleanups. Of

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the studies that were used to describe the homeless and non-homeless special needs populations, better access to resource information was a common conclusion. In addition to resource information services, homeless services are also needed as the majority of these types of services are located outside of the Urban County in the City of Memphis.

How were these needs determined?

The previously detailed needs were determined by consulting with the town managers, planners, or city engineers of the various municipalities that make up the Urban County. Each representative was asked to consider their respective community development needs in terms of public services. Based on the expressed priorities from the municipalities, general needs throughout the jurisdiction were identified. Also, based on the data regarding the jurisdiction's homeless and non-homeless special needs populations, homeless services and resource information services were identified as public service needs. Additionally, a public hearing (described in PR-15 Citizen Participation) was held on February 4, 2013 in an effort to solicit citizen input on community development needs.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

In Shelby County from 1970 to 2010, the largest increase in total housing units occurred outside of Memphis in the Urban County. 2005-2009 CHAS data indicates that there are 89,346 housing units in the Urban County, 85% of them being 1-unit detached structures. The availability of housing units does not completely meet the needs of the Shelby County population, specifically in terms of affordability. Although the number of housing units in Shelby County is greater than the number of households, there is a need for affordable housing options that are available for the various income levels, particularly for the extremely low-and low-income households.

Based on the data regarding housing costs, it can be concluded that affordable housing for low-income persons is needed within the Urban County. Extremely low-and low-income households are most affected by the current area median costs of housing. Although the area median rent is well above Fair Market Rent and Low HOME Rent rates, only a small portion of Urban County households are renters. Based on the available data regarding the condition of the overall existing housing stock, it can be concluded that rehabilitation assistance is more needed by owner-occupied households as these units make up the majority of the units with housing conditions. However, the condition of public housing units is good to very good and there are no pressing revitalization needs.

The homeless population of the Shelby County seeks services in the City of Memphis as the vast majority of the homeless facilities and services are located there.

The elderly and frail elderly, physically disabled and the developmentally disabled often need in-home accommodations to live comfortably, as the existing housing stock often does not fully meet their needs. There also appears to be a shortage of assisted living options for these populations.

Barriers to affordable housing include land acquisition costs, high rental housing tax rate, a lack of other resources and incentives to develop affordable housing in the consortium area, zoning that may prevent some from affording housing in the urban county.

Despite the arrival of new companies and jobs in the Memphis and Shelby County area, there is still a need for significant workforce and infrastructure enhancement in the business community. The demand for a more skilled and educated labor force is being met by numerous jobs skills and education initiatives in the area. Various State, regional and local incentives are available to businesses in order to spur economic growth in Memphis and Shelby County.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

In Shelby County from 1970 to 2010, the largest increase in total housing units occurred outside of Memphis in the Urban County. Between 1970 and 2010, total housing units in Memphis increased 47.4% while total housing units in the Urban County increased 331.7%. Decreasing population in Memphis in the 1980s resulted in only a 1.7% increase in total housing units from 1980 to 1990, likely attributable to a combination of increasing vacancy rates and decreasing average household size in Memphis. From 1990 to 2010, the housing inventory increased in Memphis by 17.4%. This increase was likely attributable in large part to annexation of suburban areas. Meanwhile, considerable population growth in the Urban County resulted in 34.3% increase in total housing units from 1990 to 2010. 2005-2009 CHAS data indicates that there are 89,346 housing units in the Urban County, 85% of them being 1-unit detached structures.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	76,049	85%
1-unit, attached structure	2,882	3%
2-4 units	2,035	2%
5-19 units	5,812	7%
20 or more units	1,179	1%
Mobile Home, boat, RV, van, etc	1,389	2%
Total	89,346	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2005-2009 ACS Data

Total Housing Units	1970	1980	1990	2000	2010
Memphis	197,982	244,470	248,573	271,723	291,883
	Change	23.5%	1.7%	9.3%	7.4%
Urban County	24,644	41,911	79,223	91,231	106,391
	Change	70.1%	89.0%	13.2%	16.6%
Shelby County (All)	222,626	286,381	327,796	362,964	398,274
	Change	28.6%	14.5%	10.7%	9.7%

Table 28 - Total Housing Units (1970 - 2010) - Source: U.S. Dept. of Commerce, Bureau of the Census

Housing Needs Assessment Demographics			
Demographics	Base Year: 2000	Most Recent Year: 2009	% Change
Population	218,499	239,134	9%
Households	80,202	83,998	5%
Median Income	\$39,593.00	\$44,146.00	11%
Source: 2000 Census (Base Year), 2005-2009 ACS (Most Recent Year)			

Housing Needs Assessment Demographics

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	99	0%	59	0%
1 bedroom	180	0%	2,596	19%
2 bedrooms	2,411	3%	4,871	36%
3 or more bedrooms	67,719	96%	6,063	45%
Total	70,409	99%	13,589	100%

Table 29 – Unit Size by Tenure

Data Source: 2005-2009 ACS Data

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

There are approximately 442 housing units in the Urban County that are assisted with the Housing Choice Voucher. These units are mainly concentrated in unincorporated Shelby County and Millington with fewer units located in Bartlett and Germantown. Similar to vouchers, the vast majority of the HUD Multifamily properties and Low Income Housing Tax Credit (LIHTC) properties in Shelby County are located within the City of Memphis. There are 7 LIHTC properties within the Urban County, spread between Arlington, Collierville, Millington and unincorporated Shelby County. There is also one HUD Multifamily property located in Millington. Among the LIHTC properties in the Urban County, there are 731 units that are available to low-income persons. The one HUD Multifamily property in Millington has a total of 80 housing units that are available to elderly low-income persons.

The Millington Housing Authority is the only Housing Authority operating in the Shelby County urban county jurisdiction and its operations are funded through HUD public housing subsidies and tenant rents. As discussed in the Needs Assessment, this Housing Authority operates two housing developments with a total of 89 units, all of which are occupied. The average annual income of those living in MillHA public housing is \$13,686 and their average length of stay is nine years.

During PY 2012, Shelby County Department of Housing completed a total of 37 full housing rehabilitation projects. Of these 37 full rehabilitation projects, 23 units were funded with CDBG funds and 14 units were funded with HOME Grant funds. As of June 30, 2012, 7 additional CDBG funded units were underway and an additional 3 HOME funded units were underway. During PY2012, SCDH utilized CDBG, HOME, and other funds to accomplish activities under the housing and community development goals associated with the five-year Consolidated Plan. For the first four years of the five-year Consolidated Plan, SCDH completed a total of 123 rehabilitations, or 123% of the 100 rehabilitated units projected in the 5 -Year Strategy.

Shelby County, in collaboration with the Tennessee Housing Development Agency (THDA) provided \$587,896 in DPA loans to assist 182 low- and moderate-income homebuyers during PY 2012. Additionally, using funds from the Well-Fargo settlement over predatory lending, 46 low- to

moderate-income homebuyers received down-payment assistance loans. During PY12, 1 Community Housing Development Program affordable housing unit was acquired, rehabilitated and sold to a low- to moderate-income first-time. Nonprofit NSP partners completed 14 NSP units for low- middle- and moderate-income households during PY 2012. Cumulatively, 22 NSP units have been sold, rented, or leased to income-eligible occupants and 9 units were available for occupancy. SCDH completed and cleared 26 units under the Housing Rehabilitation program, 4 units under the NSP program, and 41 units under the Lead Hazard Control Program for a total of 70 units completed and cleared.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Since 2008, the Millington Housing Authority has spent nearly a million dollars on the revitalization of housing units. Completed improvements include: roofs for all buildings, high efficiency HVAC systems in all homes, exhaust fans in all bathrooms, smoke detectors in all bedrooms including hall, carbon monoxide detectors in all homes, updated storm water drainage at Greenhill Gardens, security doors (front and side/back) doors in all homes, and playground equipment at Bill Knight Gardens and Greenhill Gardens. Due to these extensive revitalization and maintenance efforts, none of these units are expected to be lost in the near future.

According to 2005-2009 ACS estimates, the majority of homes (90%) in the Shelby County jurisdiction were built after 1969. Of the 89,346 estimated homes, 10% or 8,162 housing units were built prior to 1960. Of the older housing stock, there is a potential for housing units to be lost due to age and the implications of poor upkeep.

Other units expected to be lost are substandard units throughout the Urban County for which demolition is more feasible than rehabilitation. As of November 2013, there are an estimated 9 homes throughout the Urban County that are expected to be lost as the units are vacant and not suitable for rehabilitation; 1 vacant unit in Arlington, 4 vacant units in Millington and an additional vacant abandoned unit in Millington.

Does the availability of housing units meet the needs of the population?

The availability of housing units does not completely meet the needs of the Shelby County population, specifically in terms of affordability. There are only 89 public housing units and there are currently 29 people on the waiting list that could wait between 3 months to 7 years to move into an available unit. According to 2005-2009 CHAS data, there are 11,563 households that bear a cost burden of 30% or greater. This is likely due to the unavailability of housing for low-income persons, driving them to housing options that are more affordable for non-low-income persons. 2005-2009 CHAS data also indicates that the majority of households that are cost burdened are low-to moderate-income households, renters and owners. Overcrowding is also a common problem in low-income households. Specifically, small-related family households are most impacted by the issues of cost burden and

overcrowding. It can be concluded that housing affordability is the most pressing housing need in the Shelby County jurisdiction and there is a lack of affordable housing for low-to moderate-income families.

Describe the need for specific types of housing:

Given the amount of people on the Millington Housing Authority waiting list and the average wait time of three months to seven years, it is evident that more affordable small and large family housing is needed. Given 2005-2009 CHAS data, it can also be concluded that there is a pressing need for housing units for small-related family renters and owners. When considering the homeless and non-homeless special needs population, there is a need for transitional housing, emergency shelters, safe-houses, and homes with accessibility accommodations for the physically disabled and frail elderly.

Discussion

The most pressing housing issue in Shelby County is affordability. Although the number of housing units in Shelby County is greater than the number of households, there is a need for affordable housing options that are available for the various income levels, particularly for the extremely low-and low-income households. Housing options specifically for the homeless, former homeless and non-homeless special needs populations are also needed.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

According to TDHA, median home value and median rent in Tennessee track each other closely. The areas around Tennessee's three largest cities (Memphis, Nashville and Knoxville) have both the highest home values and highest rents.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2009	% Change
Median Home Value	90,800	0	(100%)
Median Contract Rent	459	0	(100%)

Table 30 – Cost of Housing

Alternate Data Source Name:

THDA Median Housing Sales Price (2011)

Data Source Comments: Median Homes Sales Price: \$162,500

Rent Paid	Number	%
Less than \$500	2,578	19.0%
\$500-999	8,226	60.5%
\$1,000-1,499	2,229	16.4%
\$1,500-1,999	420	3.1%
\$2,000 or more	136	1.0%
Total	13,589	100.0%

Table 31 - Rent Paid

Data Source: 2005-2009 ACS Data

Cost of Housing			
	Base Year: 2000	Most Recent Year: 2009	% Change
Median Home Value	90,800	134,700	46%
Median Contract Rent	459	580	26%
Source: 2000 Census (Base Year), 2007-2009 ACS (Most Recent Year)			

Cost of Housing

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	494	No Data
50% HAMFI	1,248	1,139
80% HAMFI	4,863	4,659
100% HAMFI	No Data	7,693
Total	6,605	13,491

Table 32 – Housing Affordability

Data Source: 2005-2009 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	567	648	768	1,049	1,170
High HOME Rent	641	688	783	952	1,041
Low HOME Rent	511	547	656	758	846

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

According to 2005-2009 CHAS data, there is not sufficient housing for households in the 0-30% or 30-50% HAMFI ranges. There are 3,759 families in the 0%-30% HAMFI range but CHAS data indicates that there are only 494 rental units available for households at the 30% HAMFI. No CHAS data is available on owner housing units that are affordable to this income level. The Millington Housing Authority's waiting list is also an indicator that there is insufficient housing for extremely low-income households. The MillHA oversees 89 units and there are currently 29 families on the waiting list that can wait from three months to seven years for an available unit. As this is the only public housing authority in the Shelby County Jurisdiction, this likely heightens the need for affordable housing options for extremely low-income households.

CHAS data indicates that there are 4,060 families in the >30%-50% HAMFI range yet there are only 2,881 affordable renter or owner housing units available. The lack of affordable housing for these two income ranges can help explain why many of these households are so severely cost burdened; lack of affordable housing drives these households to housing options that are more affordable for non-low-income persons.

How is affordability of housing likely to change considering changes to home values and/or rents?

Based on a simple extrapolation method to forecast median home values and median contract rent, housing affordability in Shelby County will continue to decline over the next five years if the current trends continue. The data used to calculate the percent change in median home values and median contract rent is for all of Shelby County. The Urban County only constitutes 26% of the Shelby County population and 24% of the number of households in Shelby County. The results of the forecast are not necessarily applicable to the Urban County as this jurisdiction has notably different social and economic characteristics than the City of Memphis which constitutes the majority of Shelby County.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Median Contract Rent in Shelby County is above the Fair Market Rent rate for a 1-4 bedroom apartment as well as the most affordable apartment, an efficiency unit. The Median Contract Rent is also higher than the Low HOME Rent rates for an efficiency to a 4 bedroom apartment in Shelby County. To afford an apartment a household would have to pay a Fair Market Rent or Low HOME Rent well above the median area rent. Within the Urban County, renters only account for 16% of all households. SCDH does not provide HOME funding for rental housing development.

Discussion

Based on the data regarding housing costs, it can be concluded that affordable housing for low-income persons is needed within the Urban County. Extremely low-and low-income households are most affected by the current area median costs of housing. Although the area median rent is well above Fair Market Rent and Low HOME Rent rates, only a small portion of Urban County households are renters.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

As the Shelby County Department of Housing has targeted public improvement/facilities in low- mod- areas, housing rehabilitation using CDBG and HOME funds has been scattered site because those areas are where many of the Urban County's low- mod- households reside.

ACS data indicates that nearly ¼ of all housing units in Shelby County have some housing condition issue. The age of the housing stock in the Urban County was predominantly built after 1980, with about 25% of the housing stock being more than 32 years old. Households with multiple housing conditions are concentrated in Unincorporated Shelby County in the community of Northaven. The majority of the housing stock of this low income community (57%) was built before 1980.

Definitions

Substandard condition: A dwelling unit characterized by non-compliance with acceptable housing and building code standards.

Substandard condition but suitable for rehabilitation: a dwelling that is not deteriorated beyond repair and/or if the costs of rehabilitation would not exceed 50% of the estimated appraised value of the property.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	16,842	24%	5,409	40%
With two selected Conditions	206	0%	233	2%
With three selected Conditions	38	0%	31	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	53,323	76%	7,916	58%
Total	70,409	100%	13,589	100%

Table 34 - Condition of Units

Data Source: 2005-2009 ACS Data

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	15,254	22%	4,060	30%
1980-1999	38,494	55%	5,073	37%
1950-1979	15,379	22%	3,730	27%
Before 1950	1,282	2%	726	5%
Total	70,409	101%	13,589	99%

Table 35 – Year Unit Built

Data Source: 2005-2009 CHAS

Vacant Units			
	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	16	4	20
Abandoned Vacant Units	5	5	10
REO Properties	N/A	N/A	559
Abandoned REO Properties	N/A	0	0
Source: Shelby County Assessor Database (REOs), Town of Arlington and City of Millington Planners/Engineers			

Vacant Units

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	16,661	24%	4,456	33%
Housing Units build before 1980 with children present	3,097	4%	1,848	14%

Table 36 – Risk of Lead-Based Paint

Data Source: 2005-2009 ACS (Total Units) 2005-2009 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 37 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

According to 2005-2009 CHAS data, 16,842 owner occupied units, 24% of all owner-occupied units, have at least one housing problem and 5,409 renter-occupied units, 40% all of renter-occupied units, have at least one housing problem. These problems may include the lack of a complete kitchen or complete plumbing, severe over crowding or severe cost burdening. Although renter-occupied units have a greater percentage of units with housing problem than owner occupied units, the number of owner-occupied units with a housing condition is more than three times greater its renter counterpart. In an effort to access vacant, vacant abandoned and REO properties within the Urban County, Shelby County Department of Housing requested data from the Shelby County Assessor and the various city planners/engineers within the Urban County. The data was not fully available from local sources, therefore only minimums for these types of units have been identified.

There are approximately 9 vacant or abandoned vacant units in the Urban County that are not suitable for rehabilitation; 1 home in Arlington and 8 homes in Millington. There are approximately 559 Real Estate Owned (REO) properties in the jurisdiction. Banks may struggle with a huge volume of backlogged properties and not have the time or capacity to tend to the homes for which they're responsible. Consequently, these REO properties may sit vacant for extended periods of time, become blighted and cause problems for their respective neighborhoods. The condition of all of the REO properties is unknown, but based on the implications of owner neglected upkeep of REO properties, some of these units may need rehabilitation.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

All housing units built before 1980 are counted herein as potentially having lead-based paint hazards, because 1978 was the first year Federal law prohibited lead in residential paint. Housing age is available in increments of ten year time periods through 1990. As not all supplies of lead-based paint were used up immediately after enactment of the ban, there will be instances wherein paint with lead was used in houses built shortly after the ban. Thus, in order to develop a conservative estimate of the of housing units that contain lead-based paint hazards, houses built through 1979 are counted.

An estimated 21,117 of the 83,998 housing units (25%) in the Shelby County Urban Entitlement Area potentially have lead-based paint hazards.

According to CHAS data, 15,654 of the Entitlement Area's households have been categorized as low- and moderate-income individuals (including extremely low-income). These individuals are dispersed evenly throughout the entitlement area, with only 2 census tracts having concentrations of low- and moderate-income individuals composing more than 50% of its total population.

If it is assumed households occupy a share of the Urban Entitlement Area's housing units by age of housing stock proportional to their population, then as many as 3,913 pre-1980 housing units could be reasoned to be occupied by extremely low-, low-, and moderate-income families. This number may be even higher, since extremely low-, low-, and moderate-income families may be more likely to occupy older housing stock than families with greater means.

Discussion

Based on the available data, it can be concluded that rehabilitation assistance is more needed by owner-occupied households as these units make up the majority of the units with housing problems.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

After the closing of the Shelby County Housing Authority in 2012, there is only one public housing authority operating in the Shelby Urban Entitlement Area. As previously mentioned, the MillHA manages and operates Bill Knight and Greenhill Gardens developments. Both developments were constructed around 1960. A Shelby County Sheriff's Office substation is located within the two developments. The MillHA consists of 89 units and has an annual budget of \$400,000. It is governed by a five-member Board of Commissioners that is appointed by the Mayor of Millington and approved by Millington's Board of Alderman to serve five-year terms. The MillHA has a Resident Advisory Board that meets once a year. The Millington Housing Authority has a staff that includes an Executive Director and operates independently of Shelby County Government.

In 2003, MillHA received a near perfect score of 97% and has continued to be a High Performer. MillHA operations are funded through HUD public housing subsidies and tenant rents.

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			90						
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are 89 public housing units operated by the Millington Housing Authority. Due to extensive renovation efforts made since 2008, all of these public housing units are in good or very good condition.

Public Housing Condition

Public Housing Development	Average Inspection Score
Bill Knight Gardens Development	89.58
Greenhill Gardens Development	74.88

Table 39 - Public Housing Condition**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

As previously mentioned, since 2008 the Millington Housing Authority has spent nearly a million dollars on the revitalization of housing units. Completed improvements include: roofs for all buildings, high efficiency HVAC systems in all homes, exhaust fans in all bathrooms, smoke detectors in all bedrooms and halls, carbon monoxide detectors in all homes, updated storm water drainage at Greenhill Gardens, security doors (front and side/back) doors in all homes, and playground equipment at Bill Knight Gardens and Greenhill Gardens. As such, the condition of these housing units is good to very good and there are no pressing revitalization needs. Minor restoration needs that have been identified by public housing residents on the Resident Advisory Board included bathroom remodeling to include more cabinet space.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Millington Housing Authority is dedicated to improving the living environment of its tenants by having regular meetings with the Resident Advisory Board and considering its input for renovation needs and potential improvements. The MillHA has done significant renovations since 2008 to maintain the housing units and to ensure that residents live in standard and secure housing. Future efforts also include installing Tank Less Water Heaters and CFL Lighting Fixtures.

Discussion:

When the Shelby County Housing Authority closed in 2012, the amount of available public housing units decreased by 175 units. It is not anticipated that any additional public and assisted housing units will be lost from the inventory during the 5 Year Strategy period. Currently, the Millington Housing Authority manages and operates 89 housing units in its two developments. A small and high performing Public Housing Authority, the MillHA operates independently of Shelby County Government. Shelby County Department of Housing is committed to providing technical assistance to Millington Housing Authorities as needed.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

As stated in the Needs Assessment, the homeless population of the Urban County seeks services in the City of Memphis as the vast majority of the homeless facilities and services are located there. It is a challenge to identify the homeless population exclusively within the Urban County so when addressing the number of homeless, the homeless population is addressed in terms of the Memphis and Shelby County area.

Community Alliance for the Homeless is the lead agency of the Memphis/Shelby County Continuum of Care and works in partnership with numerous mainstream service providers to manage facilities and services for persons who are homeless.

The Continuum coordinates a broad array of services that includes, but is not limited to:

- Needs Identification
- Prevention of Homelessness
- Emergency Shelter/Services
- Day Services
- Transitional Housing
- Support Services
- Permanent Housing
- Outreach

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	41	5	241	63	0
Households with Only Adults	409	238	837	606	0
Chronically Homeless Households	0	0	0	475	0
Veterans	0	0	140	321	0
Unaccompanied Youth	8	0	0	0	0

Table 40 - Facilities and Housing Targeted to Homeless Households

Community Alliance for the Homeless

Data Source

Comments:

Inventory of Services Available to Homeless and Special Needs Persons as of November 2013																			
Provider Organizations	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare	HIV/AIDS	Education	Employment Services	Childcare	Transportation	Food Services
Agape Child & Family Services Inc.				x					x	x									
Alpha Omega Veterans Services				x		x					x		x						x
Barron Heights Community Development										x						x			
Behavioral Health Initiatives, Inc.				x								x							
Bridges										x						x		x	
Burrito Ministry						x													x
Calvary Rescue Mission																			x
Case Management, Inc.		x	x	x					x		x								
Catholic Charities of West TN				x		x						x		x	x	x			x
Christ Community Clinic/Baptist School of Nursing							x						x	x					
Cocaine and Alcohol Awareness Program, Inc.										x	x	x			x	x			
Community Legal Clinic						x													
Comprehensive Counseling Center		x	x	x						x		x							
Door of Hope				x						x	x	x	x						x
Frayser-Millington Mental Health Center									x		x	x			x				
Friends for Life				x					x					x					x
Grace House									x	x	x	x				x			
Harbor House									x	x	x	x			x				
Health Care for the Homeless/Memphis Health Center														x					
HER Faith Ministries																		x	x

Table 2 Part 1

Inventory of Services Available to Homeless and Special Needs Persons as of November 2013													
Provider Organizations	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare
HopeWorks									x				
Karat Place									x				
LeMoyné Owen College												x	
Lending a Hand											x		
Lighthouse Ministries				x				x	x			x	x
Living for Christ													
Lowenstein House									x			x	x
Memphis Area Legal Services				x									
Memphis Area Transportation Agency (MATA)													x
Memphis Family Shelter									x			x	
Memphis Mental Health Institute										x	x		
Memphis Police Department (MPD)									x				
Memphis Recovery Center									x	x	x		
Memphis Union Mission				x					x	x		x	
MIFA	x	x	x	x					x			x	x
MPD Crisis Intervention Team (CIT)									x				
New Directions									x	x	x		
Peabody House												x	
Porter Leath				x					x			x	x
Projects to Assist in Transition from Homelessness						x							
Regional Medical Center												x	x
Salvation Army													x

Table 2 Part 2

Inventory of Services Available to Homeless and Special Needs Persons as of November 2013													
Provider Organizations	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health Counseling	Healthcare
Serenity Recovery Center									x	x	x		
Shelby County Sheriff's Office								x					
SHIELD Inc.	x	x	x						x				x
Southwest Community College													x
Synergy Foundation				x					x	x			x
Tennessee Mental Health Consumers' Association				x					x	x	x		x
TN State Dept. of Human Services								x	x				
Trinity Community Coalition Outreach				x				x	x	x			x
University of Memphis													x
Ursuline Sisters				x					x			x	x
Warriors Ministries				x					x	x			x
Workforce Investment Agency's Career Center													x
YWCA				x				x	x				

Table 2 Part 3

Provider Name	Facility Name(s)	Type of Housing Offered
Missionaries of Charity	Emergency Shelter	Emergency Shelter for Mixed Populations
YWCA	Abused Women's Shelter	Emergency Shelter for Mixed Populations
Burrito Ministry	Shelter	Emergency Shelter for Adult Individuals
Calvary Rescue Mission	Emergency Shelter	Emergency Shelter for Adult Individuals
Living for Christ	Restoration House	Emergency Shelter for Adult Individuals
Memphis Union Mission	Men's Shelter, Opportunity Center	Emergency Shelter for Adult Individuals
Peabody House	Emergency Shelter	Emergency Shelter for Adult Individuals
Salvation Army	The Zone	Emergency Shelter for Adult Individuals
Trinity Community Coalition Outreach	Emergency Shelter, Emergency Shelter	Emergency Shelter for Adult Individuals
Porter Leath	Youth Program	Emergency Shelter for Youth (Under 18 yrs.)
Youth Villages	Family Link/Safe Place	Emergency Shelter for Youth (Under 18 yrs.)
Catholic Charities	Sophia's House	Transitional Housing for Families
HER Faith Ministries	HER House	Transitional Housing for Families
Memphis Family Shelter	Family Shelter	Transitional Housing for Families
Memphis Union Mission	Intact Families	Transitional Housing for Families
MIFA	Estival Comm., Satellite Housing	Transitional Housing for Families
Salvation Army	Renewal Place	Transitional Housing for Families
Ursuline Sisters	Dorothy Day House	Transitional Housing for Families
Agape Child & Family Services Inc.	F.I.T. Program, F.I.T. Bent Tree Edition	Transitional Housing for Mixed Populations
Memphis Union Mission	Moriah House	Transitional Housing for Mixed Populations
S.W.J.M. Ministries	Transitional Home	Transitional Housing for Mixed Populations
Alpha Omega Veterans Services	Transitional Progress House, GPD- Transitional Supportive, GPD Veterans Life House	Transitional Housing for Adult Individuals
Barron Heights Community Development	GPD Barron Heights	Transitional Housing for Adult Individuals
Calvary Rescue Mission	Transitional Living	Transitional Housing for Adult Individuals
Catholic Charities	Dozier House, Genesis House , Healthcare for Homeless Vets	Transitional Housing for Adult Individuals
Cocaine and Alcohol Awareness Program	GPD V.A. Program, SHP Program	Transitional Housing for Adult Individuals
Frayser-Millington Mental Health Center	TBRA	Transitional Housing for Adult Individuals
Grace House	TBRA, Halfway House	Transitional Housing for Adult Individuals
Harbor House	Halfway House	Transitional Housing for Adult Individuals
Karat Place	Karat Place	Transitional Housing for Adult Individuals
Lending a Hand	Transitional Program	Transitional Housing for Adult Individuals
Lighthouse Ministries	Nehemiah Program	Transitional Housing for Adult Individuals
Memphis Union Mission	Calvary Colony, Wright House	Transitional Housing for Adult Individuals
Mission Global Ministry	Transitional Program, Transitional Program	Transitional Housing for Adult Individuals
Odessa's Foster Care	Health Care for Homeless Vets	Transitional Housing for Adult Individuals
Synergy Foundation	Transition to Independence	Transitional Housing for Adult Individuals
The Salvation Army	Adult Rehab. Center	Transitional Housing for Adult Individuals
Trinity Community Coalition Outreach	Transitional Housing	Transitional Housing for Adult Individuals
Warriors Ministries	Halfway House, Recovery Program, Recovery Program	Transitional Housing for Adult Individuals
MIFA	HPRP Homeless Assistance	HPRP- Rapid Rehousing for Families
Case Management, Inc.	Family Haven Apartments	Permanent Supportive Housing for Families
Alpha Omega Veterans Services	Court Street, Depot Towns Homes, Depot SRO/Community Service	Permanent Supportive Housing for Adult Individuals
Behavioral Health Initiatives	Phoenix Project	Permanent Supportive Housing for Adult Individuals
Case Management, Inc.	TBRA, Homles Rd., Boyette Memorial, Poplar Avenue, Alice Avenue	Permanent Supportive Housing for Adult Individuals
City of Memphis/Case Management, Inc.	HomePlus	Permanent Supportive Housing for Adult Individuals
City of Memphis/Friends for Life	Aloysius Homes S	Permanent Supportive Housing for Adult Individuals
City of Memphis/SHIELD Inc.	S Program	Permanent Supportive Housing for Adult Individuals
Door of Hope	Pilgram's Rest, One Door at a Time, 245 North Bellevue	Permanent Supportive Housing for Adult Individuals
Frayser-Millington Mental Health Center	North Hill Woods	Individuals
Shelby County Government	Permanent Housing for Chronically Homeless, No Place Like Home	Permanent Supportive Housing for Adult Individuals
TMHCA	Beers Van Gogh Center for Ex	Permanent Supportive Housing for Adult Individuals
Trinity Community Coalition Outreach	Permanent Supportive Housing	Permanent Supportive Housing for Adult Individuals
Veterans Administration	VASH, VASH	Permanent Supportive Housing for Adult Individuals

Inventory of Homeless Facilities

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The following supportive services are available to most homeless persons:

- Health care
- Temporary Assistance for Needy families, Food Stamps, and child care
- Dental and vision on a limited basis
- Mental health services on a limited basis
- Substance abuse treatment and counseling
- Employment services on a limited basis
- legal services
- Domestic violence services
- Limited outreach and engagement
-

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Each year, among the programs that serve homeless individuals and families in Shelby County, there are various changes. Programs may open or close, change service approach or population, and/or reduce or expand capacity. “Table 1” lists the organizations, their facilities and respective housing services that are available to the Memphis and Shelby County homeless population. “Table 2” displays the non-housing related support services that are available for the homeless and serve chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Shelby County Department of Housing does not receive funding to directly assist the special needs population. SCDH relies on outside organizations that directly help those with special needs to refer those needing assistance in the way of housing rehabilitation or down-payment assistance.

SCDH assists in making owner-occupied housing safe and assessable for any person that meets the guidelines. We also will provide down-payment assistance for persons who qualify for the program. SCDH will continue to work with outside agencies in coordinating referrals to assist members of the non-homeless special needs population.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

As discussed in the Needs Assessment, the elderly and frail elderly, physically disabled and the developmentally disabled, may need in-home accommodations to live comfortably. Assisted living options for these populations are also needed. In previous years, SCDH has used HOME and CDBG grant funds to make in-home accommodations for the physically disabled which included: wheelchair ramps (both exterior and interior) and in extreme cases a wheelchair lift; widened doors; lowered light switches and thermostats; tub rails; accessible toilets; changed vanity cabinets to wall hung sinks; lowered mirrors; modified cabinets; lowered closet runs; replaced carpet with vinyl; eliminated bathtub and put in handicap assessable shower; replaced door knobs with lever handles; and provided keyless entries.

In the City of Memphis, there are 14 assisted care living facilities that have 988 beds. Almost all of the assisted care living facilities serve a population whose income exceeds 80% of adjusted median income (AMI). The homes for the aged total 16 facilities having 182 beds. These facilities are generally small and serve a population whose incomes are below 50% AMI. A significant gap is noted in the availability of assisted care living facilities that serve a low-and moderate-income population. Persons with physical and developmental disabilities are provided housing and supportive services through a host of county, state and non-profit agencies.

According to the 2012 Memphis Transitional Grant Area Ryan White Needs Assessment, unmet support service needs for persons living with HIV/AIDS (PLWHA) include housing services and utility assistance. When comparing unmet needs of the PLWHA population in 2009 and 2012, the assessment found that housing services and utility assistance services were among the top two services needed by consumers in both instances.

Persons with severe mental illness, substance abuse issues, and victims of domestic violence need support services to reduce their risk of homelessness in addition to services specific to their issues; rehabilitation, medication, counseling and case management, halfway houses, transportation and employment services. Persons with mental illnesses are often dually diagnosed as substance abusers, and homelessness likely intensifies the symptoms of the diseases. Support services for persons with dual diagnoses are needed to address the diseases, stabilize the person and reduce his or her chances of being homeless.

According to the Millington Housing Authority Executive Director, the public housing residents would benefit from programs that provide a resident employment and training center, case management, and a Family Self-Sufficiency Program. This group needs better access to knowledge that will help improve their social and economic situation and resources that would prepare them to eventually become homeowners. Such a service could be provided through a social worker that periodically visits tenants.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Regional Medical Center (The MED) in Memphis serves the overwhelming majority of homeless and other severely disadvantaged people in Memphis and has discharge policies to help prevent homelessness. Because The MED serves so many uninsured and critically ill people, the hospital has major financial problems that make it financially impossible for it to refrain from discharging people until appropriate housing is secured. However, the MED is a participant in a local collaboration to help prevent patients requiring supportive housing from becoming homeless upon discharge. The Supportive Housing Information hotline program developed by the Salvation Army in collaboration with all local providers of supportive housing, provides discharge planners with reliable, up-to-date information on the daily availability of supportive housing beds/units and has an executed Memorandum of Agreement with the MED outlining the respective responsibilities.

The State Department of Mental Health and Memphis Mental Health Institute (MMHI), the State's acute care facility in Memphis, have discharge policies that require housing as a condition of discharge. In addition, MMHI is a participant in a local collaboration to help prevent patients requiring supportive housing from becoming homeless upon discharge. The Supportive Housing Information hotline program developed by the Salvation Army in collaboration with all local providers of supportive housing, provides discharge planners with reliable, up-to-date information on the daily availability of supportive housing beds/units and has executed a Memorandum of Agreement with MMHI outlining the respective responsibilities. Also, the City of Memphis provides funding to Case Management Inc. to help coordinate the releases of mentally ill patients from Shelby County and City jails. In addition, the Community Alliance for the Homeless facilitates the role of Homeless Referral Center (a program administered by the MIFA) in helping to connect persons returning from health institutions with supportive services and housing. The program was established to provide a single source of up-to-date and readily available information on permanent supportive housing resources.

By law, the Tennessee Department of Corrections, which operates the State correctional facility in Memphis/Shelby County, is required to release inmates when their terms have been served. It would be a violation of law for the Department to enter into an agreement with the Memphis-Shelby County Continuum of Care that would require the State to retain custody of inmates who have completed their sentences until appropriate housing has been located and secured. However, the State has developed and implemented policies for pre-release programs to help ensure that inmates have an opportunity to acquire the skills and education that can help prevent homelessness and recidivism. Inmates who are due to be released or paroled in the near future are given first priority for those services, which include linkage to housing and limited housing assistance through the Department's re-entry program. SCDH plans to continue to support these agencies in their policies.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

SCDH does not intend to use its limited CDBG or HOME grant funds to provide services specifically for the special needs population. We are committed to serving any members of the special needs population, such as the frail elderly and disabled that qualify for our Housing Rehabilitation Program by providing accessibility modifications.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

SCDH does not intend to use its limited CDBG or HOME grant funds to provide services specifically for the special needs population. We are committed to serving any members of the special needs population, such as the frail elderly and disabled that qualify for our Housing Rehabilitation Program by providing accessibility modifications.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Based on the 2011 Shelby County Analysis of Impediments to Fair Housing, the following are public policy related barriers to affordable housing:

Land Acquisition Costs. High cost makes affordable housing development in the urban county very difficult, if not impossible.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing. The tax rate for multi-family rental housing is substantially higher than the rate for single-family housing.

Lack of other resources and incentives to develop affordable housing in the consortium area. There are little or no other governmental or philanthropic resources or incentives for affordable housing development within urban county.

Exclusionary Zoning Prevents Many Households From Living in the Urban County. Housing codes within some of the cities in the consortium contain minimum lot size requirements, restrictions on multi-family housing, and other prohibitions that may have the potential effect of excluding low and moderate incomes households.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Based on the Business Activity table provided, there are three major employment sectors within the Urban County. The Education and Health Care Services sector recorded 24,867 workers in the 2005-2009 American Communities Survey. The Transportation and Warehousing business sector was second, employing 14,824 workers with the Retail Trade business sector following closely in third by employing 13,189 workers. Although the Retail Trade sector has the 3rd largest share of workers, the sector has 8% fewer workers than there are jobs in its sector. With the largest share of workers, the Education and Health Care Services sector is oversaturated as the sector has 3% more workers than there are jobs. The Transportation and Warehousing sector is also oversaturated as the sector has 8% more workers than there are jobs. It can be concluded that there is a need for more skilled and educated members of the workforce as the Retail Trade and Professional, Scientific, Management Services sectors are the sectors with the least workers in comparison to available jobs.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	365	268	0	0	0
Arts, Entertainment, Accommodations	8,111	15,836	7	9	2
Construction	5,635	7,100	5	4	-1
Education and Health Care Services	24,867	32,405	21	18	-3
Finance, Insurance, and Real Estate	9,027	12,296	8	7	-1
Information	1,977	6,000	2	3	1
Manufacturing	12,076	11,438	10	6	-4
Other Services	5,709	9,572	5	5	0
Professional, Scientific, Management Services	11,541	28,221	10	15	5
Public Administration	6,612	5,710	6	3	-3
Retail Trade	13,189	35,411	11	19	8
Transportation and Warehousing	14,824	6,675	12	4	-8
Wholesale Trade	5,931	11,624	5	6	1
Total	119,864	182,556	--	--	--

Table 41 - Business Activity

Data 2005-2009 ACS (Workers), 2010 ESRI Business Analyst Package (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	126,091
Civilian Employed Population 16 years and over	119,864
Unemployment Rate	4.94
Unemployment Rate for Ages 16-24	16.53
Unemployment Rate for Ages 25-65	2.91

Table 42 - Labor Force

Data Source: 2005-2009 ACS Data

Occupations by Sector	Number of People
Management, business and financial	50,812
Farming, fisheries and forestry occupations	194
Service	14,002
Sales and office	36,070
Construction, extraction, maintenance and repair	7,700
Production, transportation and material moving	11,086

Table 43 – Occupations by Sector

Data Source: 2005-2009 ACS Data

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	72,185	63%
30-59 Minutes	38,297	34%
60 or More Minutes	3,754	3%
Total	114,236	100%

Table 44 - Travel Time

Data Source: 2005-2009 ACS Data

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,993	478	2,076
High school graduate (includes equivalency)	18,906	1,082	6,741
Some college or Associate's degree	33,431	1,295	6,917
Bachelor's degree or higher	47,622	1,020	8,496

Table 45 - Educational Attainment by Employment Status

Data Source: 2005-2009 ACS Data

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	167	358	488	1,008	1,526
9th to 12th grade, no diploma	2,281	1,347	1,122	2,224	2,192
High school graduate, GED, or alternative	5,103	5,364	7,304	14,160	7,711
Some college, no degree	6,058	6,409	8,802	17,086	5,212
Associate's degree	269	1,515	3,503	4,856	916
Bachelor's degree	1,642	7,890	11,688	17,815	2,810
Graduate or professional degree	166	3,435	6,207	10,683	1,982

Table 46 - Educational Attainment by Age

Data Source: 2005-2009 ACS Data

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or Associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0

Table 47 – Median Earnings in the Past 12 Months

Data Source: 2005-2009 ACS Data

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the Business Activity table provided, there are three major employment sectors within the Urban County. The Education and Health Care Services sector recorded 24,867 workers in the 2005-2009 American Communities Survey. The Transportation and Warehousing business sector was second, employing 14,824 workers with the Retail Trade business sector following closely in third by employing 13,189 workers. Although the Retail Trade sector has the 3rd largest share of workers, the sector has 8% fewer workers than there are jobs in its sector. With the largest share of workers, the Education and Health Care Services sector is oversaturated as the sector has 3% more workers than there are jobs. The Transportation and Warehousing sector is also oversaturated as the sector has 8% more workers than there are jobs. It can be concluded that there is a need for more skilled and educated members of the workforce as the Retail Trade and Professional, Scientific, Management Services sectors are the sectors with the least workers in comparison to available jobs.

Describe the workforce and infrastructure needs of the business community:

The workforce and infrastructure needs of the Memphis and Shelby County business community can best be described as:

- Vocational educational services
- Job training programs
- Improved transportation network to support the access to national and international business markets
- Job skills training for the unemployed and underemployed

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Through the efforts of the Memphis Chamber's Economic Development Team, new vendor and employment opportunities in the Memphis and Shelby County area include:

City Brewing Company

Electrolux

FedEx

Great American Steamboat Company

Kruger Products

Mitsubishi Electric

New industries such as the Mitsubishi Electric Plant and Electrolux are constructing new facilities in Memphis that present new, higher paying jobs opportunities. There have been improvements at the Burlington Northern Santa Fe (BNSF), Norfolk Southern and Illinois Central Railroad yards to increase intermodal capacity. Construction of Interstates 69, 269 and 22 will add more access points to the Memphis area in addition to road interchange modifications that allow for better traffic flow through the city.

The local Workforce Investment Network (WIN) offers training programs to help improve the labor force for the new jobs coming to the city of Memphis. Through September 2012, about 251 people have taken the Industrial Readiness Training courses provided by WIN initiatives and 141 have been hired for jobs in Memphis. 93% percent of those hired live in Shelby County. Companies such as Blues City Brewery and the Kruger paper processing plant in North Memphis have hired workers from the training.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The 2005-2009 ACS data shows that there are more Urban County residents with some college (no degree) or less educational attainment in comparison to the residents that have an associates degree or a higher level of educational attainment; 103,633 versus 75,377. The skills and education of the current workforce do not correspond to employment opportunities in the Urban County. A more skilled workforce is desired as the job industries that have larger shares of the jobs are in fact understaffed, particularly the Retail Trade and Professional, Scientific, and Management Services industries.

Specialized employment opportunities with higher education requirements have seen a rise over the years and this national trend can also be seen in the Memphis and Shelby County workforce. The skills of current workforce members need to be improved to meet the demands of the workforce and available employment opportunities.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

FastTrack Job Training Assistance Program (FJTAP)

The FastTrack Job Training Assistance Program is Tennessee's initiative to support industrial recruitment and expansion through direct training assistance for newly hired employees, employees in upgraded positions, and employees retained through instruction. FJTAP staff assists each individual company to develop customized training plans and to provide funding.

Eligibility for FJTAP support and levels of funding for training assistance are determined by the amount of company investment, the number of new hires, and the types of skills and knowledge that must be obtained by prospective or newly hired employees

Tennessee Job Skills (TJS)

This program focuses on employers and industries which create high skill, high wage jobs in emerging, high-demand and technology focused sectors of the economy. Training staff will work with companies to develop a unique, flexible, comprehensive training plan which meets the company's initial training needs and will then follow up to insure each phase of the program meets the company's needs. Companies track costs and apply to the state for reimbursement. Reimbursement rates depend on the level of training and the types of instructors utilized.

Applicant Recruitment and Screening

Utilizing the company's job specifications, the Tennessee Department of Labor and Workforce Development will recruit and screen job applicants through the department's Job Service Division. Those applicants meeting the company's criteria will be forwarded to the company for hiring consideration.

Training & Certification

The Tennessee Department of Labor and Workforce Development provides leadership training for supervisors, team leaders and managers on interpersonal skills required to motivate employees; team training where interpersonal communication is essential between supervisors and team members; and instructor certification based on a company's specific requirements.

Workforce Investment Network

Workforce Investment Network (WIN) is a community resource dedicated to improving employment opportunities in Memphis, Shelby County, and Fayette County. WIN integrates the resources and activities of several federal programs. By fusing these programs into one focused workforce development service location, WIN helps match job seekers with local businesses who are hiring, and provides residents with services, training, skills, and education to promote personal growth and professional advancement.

Workers' Interfaith Network

This network provides job readiness and skills training through a partnership with 38 training providers including the Tennessee Career Centers, Southwest Tennessee Community College and the University of Tennessee Health Sciences Center.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The Memphis Area Association of Governments (MAAG) is the local development district created by the State of Tennessee to serve as the regional entity to address community and economic development issues. MAAG is also the designated development district for the region for the Economic Development Administration (EDA). In this capacity, MAAG serves Shelby County as well as Fayette, Lauderdale, and Tipton counties in West Tennessee and also provides assistance to Crittenden County in Arkansas, and Desoto County in Mississippi. As the designated development district for the EDA, MAAG is charged with developing, maintaining, and implementing a Comprehensive Economic Development Strategy (CEDS) for Fayette, Lauderdale, Tipton, and Shelby counties. The CEDS reviews the history and analyzes the current economic climate of the area. The CEDS also develops goals and objectives for the region and identifies projects that will encourage and promote community and economic development throughout the region. The economic development initiatives MAAG is currently undertaking in accordance with the current CEDS include identifying resources to undertake an analysis of the causes of nontraditional behavior of unemployment rates for the core County and the MSA; identifying the role of the Association in examining biofuels as an economic development asset; broadband access feasibility;

enhancing working relations with local chambers of commerce; enhancing working relation with regional economic development organizations; attending County Joint Economic and Community Development Committee Meetings; project refinement, resource identification and implementation assistance; and supporting a Workforce Development Forum.

There are numerous local tax incentives for business throughout the Memphis and Shelby County Area. For example, the Millington/Shelby County Payment in Lieu of Tax (PILOT) is available for projects involving large capital investment and high levels of job creation. Approval is based on a number of performance standards, including the number and type of jobs created, annual base wage, capital investment in real and personal property, and the location of the project. Property taxes are frozen at the pre-development level.

In addition to the training and workforce assistance incentives that are available, project assistance, infrastructure and energy incentives, and financing incentives are also available. Project assistance ranges from research assistance and the provision of data to no-cost assistance in solving an existing industry's managerial and technical problems. Memphis Light, Gas and Water offers electric and natural gas incentive rates to industrial operations locating or expanding in the Memphis service area. The Memphis and Shelby County Industrial Development Board is authorized to issues bonds for financing industrial facilities through its Industrial Revenue Bond Program.

The Memphis & Shelby County Greenprint Plan is a sustainability plan that encompasses the Memphis and West Memphis MPO areas and will examine the potential for new green jobs and industries and renewable energy resources. Primarily a regional plan, the Memphis & Shelby County Greenprint Plan will study the economic, social and physical development needs of the metropolitan region.

Discussion

Despite the arrival of new companies and jobs in the Memphis and Shelby County area, there is still a need for significant workforce and infrastructure enhancement in the business community. The demand for a more skilled and educated labor force is being met by numerous jobs skills and education initiatives in the area. Various State, regional and local incentives are available to businesses in order to spur economic growth in Memphis and Shelby County.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

As determined in the Needs Assessment, the majority of households with multiple housing problems are Black/African American households. Black/African American households are concentrated in the unincorporated parts of Shelby County; the Northaven community, the Millington Reserve area near Austin Peay Highway and the Memphis reserve area near Collierville, south of Germantown. Concentration is defined as more than 50% of the population within a census tract.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Black/African American households are concentrated mainly in the unincorporated parts of Shelby County. The census tract that constitutes the Northaven community has a 60% Black/African American population. This census tract is also Low-Mod as 68% of the households are low-to moderate income households. The only other Low-Mod census tract within the jurisdiction is in Collierville which is comprised of 67% Low-Mod households. The census tract that constitutes the Millington Reserve area near Austin Peay Highway consists of 74% Black/African American households. This racial group is also concentrated in the Bartlett reserve area (80%) as well as in the Memphis reserve area near Collierville, South of Germantown. Of the census tracts within this Memphis reserve area, the average concentration of Black/African American household is approximately 80%.

Concentration is defined as more than 50% the population within a census tract.

What are the characteristics of the market in these areas/neighborhoods?

The median home values of these areas are generally lower than other median home values throughout the Urban County. These neighborhoods have a predominately minority, low-income, and low educational attainment population where many of these areas have lower housing costs.

Are there any community assets in these areas/neighborhoods?

In or near most of these areas, there are public facilities such as parks, churches, libraries and community centers. Specifically, located near the Northaven community is the Meeman Shelby State Park and this community also has an active neighborhood association. This community is home to the Northwest Shelby County Community Center. The Town of Collierville System currently contains 19 regional, community or neighborhood parks. There are numerous official and unofficial neighborhood

associations in Collierville. A new group that is active in the Collierville community is the Council of Neighborhoods which consists of representatives from the neighborhood associations.

Are there other strategic opportunities in any of these areas?

Shelby County Department of Housing allocates 15% of HOME funds for Community Housing Development Organizations (CHDO). These organizations typically assist neighborhoods by buying dilapidated and foreclosed properties in low-to moderate-income areas and rehabilitating and/or constructing homes. Such efforts do not happen exclusively in these communities as redevelopment occurs throughout the jurisdiction, offering expanded affordable housing opportunities.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Shelby County Urban Entitlement includes unincorporated Shelby County and the municipalities of Arlington, Bartlett, Collierville, Germantown, Memphis, Millington, and Lakeland. SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. Housing services offered in accordance with this plan will be made available on a county- or jurisdiction-wide basis and non-housing community development activities will be rotated among the urban county consortium members.

High priority needs identified in the 5 Year Strategy planning process include:

- Housing Rehabilitation, Modification, Repair & Choice;
- Flood Drain Improvements;
- Parks and Recreational Facilities;
- Senior Centers;
- Sidewalks;
- Street Improvements; and
- Water and Sewer Improvements.

Anticipated resources for the 5 Year Strategy were established during the planning process ahead of announcement of Program Year 2014 formula allocation announcement. Accordingly, for planning, citizen participation, and public review and comment purposes, SCDH proposes adjusting funding for each activity either up or down according to priorities described in the “Anticipated Resources” section of this Strategic Plan section.

SCDH will be the primary organization responsible for the administration of funds, implementation of projects and programs, and the expenditure of all grant allocations and will coordinate efforts and activities within the Urban County community.

The following are the three goals for this strategic plan:

- Preserve the existing housing stock and create opportunities for affordable/fair housing choice
- Reduce the harmful affects of lead-based paint
- Improve communities.

The Millington Housing Authority and Memphis Housing Authority operate small public housing complexes in the Urban County and will continue to utilize Resident Advisory Boards and other mechanisms to engage and involve residents.

Activities to address homelessness are primarily coordinated through the Memphis and Shelby County Homeless Consortium. Continuum of Care funds in Shelby County are awarded to the City of Memphis. SCDH's plans a comprehensive approach to addressing LBP hazards and increasing access to housing units without LBP hazards through both the Lead Hazard Control Program and Housing Rehabilitation Program.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

1	Area Name:	Shelby County Urban County Entitlement Area
	Area Type:	Urban County
	Other Target Area Description:	Urban County
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	Shelby County, Tennessee
	Area Type:	County Jurisdiction
	Other Target Area Description:	County Jurisdiction
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

Table 48 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

There are seven municipalities in Shelby County including Arlington, Bartlett, Collierville, Germantown, Memphis, Millington, and Lakeland. The Shelby County Urban Entitlement includes unincorporated Shelby County and all of these municipalities except Memphis.

SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. This is primarily because concentrations of low- and moderate-income areas in the jurisdiction are limited, low- and moderate-income area and households are spread throughout the jurisdiction, and assistance is allocated based upon population data from each of the 6 municipalities within the jurisdiction. The Shelby County Urban Entitlement Area is a diverse community including a mixture of suburban and rural development.

Housing services offered in accordance with this Strategic Plan will be made available on a county- or jurisdiction-wide basis. Non-housing community development activities will be rotated among the urban county consortium members as resources permit and in accordance with the Strategic Plan to provide benefits in low- and moderate-income areas or direct benefit to low- and-moderate income clients as applicable.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	Housing Rehab, Modification, Repair, & Choice
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Other
	Geographic Areas Affected	Urban County County Jurisdiction
	Associated Goals	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint
	Description	Housing rehabilitation, modification, and repair to preserve the existing housing stock, assist cost burdened extremely low-, low-, and moderate-income households with maintaining an affordable home, provide lead-safe housing for families with children under 6 years of age, increase the ability for households and families to obtain decent housing, and provide modifications to allow the elderly to age and place and improve accessibility for the physically disabled.
	Basis for Relative Priority	The basis for this priority is established in the needs analysis, particularly with respect to the issues of cost burden, aging, and accessibility.
2	Priority Need Name	Flood Drain Improvements
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Urban County

	Associated Goals	Improve communities
	Description	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, flood drain improvements has been identified as a high priority need.
	Basis for Relative Priority	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs identified flood drain improvements as a high priority need.
3	Priority Need Name	Parks and Recreational Facilities
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Urban County
	Associated Goals	Improve communities
	Description	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, parks and recreational facilities (including ADA accessibility improvements) has been identified as a high priority need.
	Basis for Relative Priority	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs identified parks and recreational facilities (including ADA accessibility improvements) as a high priority need.
4	Priority Need Name	Senior Centers
	Priority Level	High
	Population	Extremely Low Low Moderate Elderly Non-housing Community Development
	Geographic Areas Affected	Urban County
	Associated Goals	Improve communities

	Description	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, senior centers been identified as a moderate to high priority need.
	Basis for Relative Priority	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs identified senior centers as a moderate to high priority need.
5	Priority Need Name	Sidewalks
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Urban County
	Associated Goals	Improve communities
	Description	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, sidewalks (including ADA accessibility improvements) has been identified as a high priority need.
	Basis for Relative Priority	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs identified sidewalks (including ADA accessibility improvements) as a high priority need.
6	Priority Need Name	Street Improvements
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Urban County
	Associated Goals	Improve communities
	Description	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, street improvements have been identified as a high priority need.

	Basis for Relative Priority	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs identified street improvements as a high priority need.
7	Priority Need Name	Water and Sewer Improvements
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Urban County
	Associated Goals	Improve communities
	Description	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, water and sewer service improvements have been identified as a high priority need
	Basis for Relative Priority	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs identified water and sewer service improvements as a high priority need.

Table 49 – Priority Needs Summary

Narrative (Optional)

As the Needs Assessment illustrates, housing rehabilitation (to include modifications to improve accessibility and repairs to address lead-based paint hazards) emerges as a high priority need effecting a range of extremely low-, low-, and moderate-income households. Addressing this need will help achieve the goal of preserving the existing housing stock and addressing the harmful affects of lead-based paint in Shelby County including the Urban County.

Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment reveals that flood drain improvements, parks and recreational facilities (including ADA accessibility improvements), sidewalk improvements (including ADA accessibility improvements), and street improvements are high priority needs throughout the Urban County. Additionally, Senior Center improvements in Lakeland were identified as a moderate to high priority. Addressing these needs will help achieve the goal of improving communities in the Urban County.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	SCDH has not identified TBRA as a high priority need for use of limited CDBG and HOME funding.
TBRA for Non-Homeless Special Needs	SCDH has not identified TBRA for non-homeless special needs populations as a high priority need for use of limited CDBG and HOME funding.
New Unit Production	SCDH has identified the need for affordable homeownership opportunities in the urban county as a high priority need and proposes utilizing the HOME CHDO set-aside to homeownership opportunities either through acquisition and new unit production or rehabilitation of the existing housing stock.
Rehabilitation	Preserving the existing housing stock and reducing the harmful effects of lead-based paint has been identified as a high priority need.
Acquisition, including preservation	SCDH has identified the need for affordable homeownership opportunities in the urban county as a high priority need and proposes utilizing the HOME CHDO set-aside to homeownership opportunities either through acquisition and new unit production or rehabilitation of the existing housing stock.

Table 50 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Anticipated CDBG and HOME resources, including the PY2014 allocation and projected resources for the remaining term of the 5 Year Strategy (assuming level program funding), are shown below.

SCDH proposes applying all CDBG program income received during each program year toward the Housing Rehabilitation Program and/or Minor Home Repair Program.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,065,000	10,000	0	1,075,000	4,300,000	These anticipated resources are based upon generally level funding as of PY14.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	299,203	5,000	0	304,203	1,216,812	These anticipated resources are based upon generally level funding as of PY14.

Table 51 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will leverage additional resources including approximately \$150,000 in private funds through nonprofit CHDO developers receiving the HOME CHDO set-aside funds and approximately \$336,600 in local funds to meet HOME matching requirements.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

It is not anticipated that publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

Discussion

These anticipated resources are based upon generally level funding CDBG and HOME funding consistent with Program Year 2013 allocations. Dramatic or unexpected shifts in funding could substantially alter this description of anticipated resources.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
SHELBY COUNTY	Government	Non-homeless special needs Ownership Planning	Jurisdiction

Table 52 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

As the primary organization responsible for the administration of funds, implementation of projects and programs, and the expenditure of all grant allocations, SCDH will coordinate efforts and activities within the Urban County community. This coordination will involve the administration and delivery of all CDBG and HOME funds as well as activities funded with these funds. SCDH operates under the direct authority of the Mayor of Shelby County and will continue to be advised by the UCC. Shelby County Government will contract with the respective municipalities for all community development projects during the 5 Year Strategy term and will directly administer and/or deliver those programs/projects associated with Housing Rehabilitation and Minor Home Repair. This structure will enable all municipalities and Shelby County to have direct control of these funds. The Mayor of Shelby County, representing the Entitlement Area as a whole, will have final approval of all expenditures.

SCDH will continue to take advantage of upcoming training opportunities for staff directly involved in the delivery and administration of funds. SCDH will also provide training to the staff of its Urban County partners as requested in order to insure that participating municipalities are aware of their responsibilities under the entitlement programs.

A key strength in SCDH's housing and community development delivery system is its record of successful partnerships with both public and private sector partners including the municipale members of the Urban County Consortium. Communication, cooperation, and coordination between these partners continue to remain strong. SCDH has and will continue to coordinate closely with these partnering agencies and organizations to strengthen regulatory compliance, monitoring, and technical capacity of partners involved in program or activity delivery.

The most significant gap in SCDH's development delivery system remains a lack of sufficient funding to support housing and community development activities. Fiscal challenges at both the federal, state, and local level limit SCDH's ability to expand services and comprehensively address merging issues.

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Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		X
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
	X	X	X

Table 53 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The service delivery system in Shelby County as a whole includes a range of housing and supportive services for a wide range of subpopulations. The City of Memphis has a centralized intake for homeless families, and a coordinated assessment process for adults unaccompanied by children. There are street outreach teams, mainstream benefit supports, and targeted outreach to veterans and mentally ill individuals. For chronically homeless individuals, there are 606 units of Permanent Supportive Housing according to the City of Memphis, more than half of which are designated for chronically homeless veterans. Recently, with funding from Shelby County, The City of Memphis launched an Assertive

Community Treatment team that provides intensive support services (mental health, substance abuse, vocational counseling, peer support, and life skills assistance) to chronically homeless individuals housed in several different permanent housing programs who need additional assistance to remain housed. Despite a call for a reduction of 50% in the number of transitional housing units over 5 years based on research questioning the effectiveness of this approach, programs that operate without public funding (typically faith-based recovery programs) have continued to open or expand, adding over 100 units beginning in 2011. There are transitional housing units for families with children, veterans, and single individuals in recovery from substance abuse and/or mental illness. There is also limited free shelter for single individuals and families with children and a more significant and growing focus on rapid rehousing for families with children. Due to Tennessee laws governing truancy and unaccompanied minors, there are a small number of beds (shelter or transitional) focused on homeless youth and a significant capacity shortage for this population has not been identified.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Key strengths include the centralized intake process that seeks to prevent homelessness for at risk families and match families who have no choice but to enter homelessness with the best fit intervention. The 100,000 Homes initiative to target the most vulnerable individuals for permanent supportive housing through a validated assessment tool is also a key strength. There is a relatively strong network of mental health providers who offer services at no charge for persons with significant behavioral health challenges. This and lenient occupancy laws allow special needs populations to survive on extremely low incomes through shared housing strategies. Primary gaps are for permanent housing options for individuals or families with no income, disability application assistance, free shelter for at least three weeks for unaccompanied men and women, and permanent housing for high service need homeless families with children. Finally, there is a need to identify appropriate housing options for victims of domestic violence. Programs currently offered by the City of Memphis have somewhat low occupancy despite a very large population of victims in the community.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Limited resources for addressing priority needs are expected to create a gap in fully addressing priority needs. Shelby County's experience in administering CDBG and HOME funds in coordination with the Urban County municipalities will continue to be key in effectively addressing priority needs with all limited available resources.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve & create housing affordability & choice	2014	2018	Affordable Housing Non-Homeless Special Needs Fair Housing	Shelby County Urban County Entitlement Area	Housing Rehab, Modification, Repair, & Choice	CDBG: \$2,080,325 HOME: \$1,371,415	Homeowner Housing Rehabilitated: 100 Household Housing Unit
2	Reduce the harmful affects of lead-based paint	2014	2018	Lead-Safe Housing for Families with Children under 6 Years of Age	Shelby County, Tennessee	Housing Rehab, Modification, Repair, & Choice	CDBG: \$500,000	Other: 75 Other
3	Improve communities	2014	2018	Non-Housing Community Development	Shelby County Urban County Entitlement Area	Flood Drain Improvements Parks and Recreational Facilities Senior Centers Sidewalks Street Improvements Water and Sewer Improvements	CDBG: \$900,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 500 Households Assisted

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve & create housing affordability & choice
	Goal Description	Preserve existing housing to maintain the supply of existing affordable housing and create opportunities for affordable housing choice. Outcomes include availability/accessibility as well as affordability.
2	Goal Name	Reduce the harmful affects of lead-based paint
	Goal Description	Provide lead-safe housing in Shelby County by leveraging CDBG funds with HUD Healthy Homes and Lead Hazard Control funds. Achieving this goal is contingent upon continued receipt of HUD Lead-Based Paint Hazard Control funds during the 5-Year Strategy period.
3	Goal Name	Improve communities
	Goal Description	Assist local municipalities and the Shelby County Government in providing safe, aesthetically pleasing, and functional communities for their residents.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Shelby County estimates providing affordable housing to 5 extremely low-income, low-income, or moderate-income families in partnership with nonprofit developers receiving HOME CHDO set-aside funds.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not applicable.

Activities to Increase Resident Involvements

The MillHA has a Resident Advisory Board that meets once every year and also holds a public hearing once every year. MillHA indicated that that this board will continue to meet and these public hearings will continue to be held during the 5-Year Strategy Period. MillHa also reported that it publishes a newsletter to inform residents.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

Not applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Based on the 2011 Shelby County Analysis of Impediments to Fair Housing, the following are public policy related barriers to affordable housing:

Land Acquisition Costs. High cost makes affordable housing development in the urban county very difficult, if not impossible.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing. The tax rate for multi-family rental housing is substantially higher than the rate for single-family housing.

Lack of other resources and incentives to develop affordable housing in the consortium area. There are little or no other governmental or philanthropic resources or incentives for affordable housing development within urban county.

Exclusionary Zoning Prevents Many Households From Living in the Urban County. Housing codes within some of the cities in the consortium contain minimum lot size requirements, restrictions on multi-family housing, and other prohibitions that may have the potential effect of excluding low and moderate incomes households.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Land Acquisition Costs. SCDH anticipates using HOME CHDO funds to assist nonprofit affordable housing developers with costs, including acquisition costs, necessary to create affordable housing opportunities.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing. SCDH intends to coordinate efforts with THDA to make information available about Tax Credits, their use in Shelby County and other State programs available at the local level, including outreach workshops to provide direct information on both state and local initiatives.

Lack of other resources and incentives to develop affordable housing in the consortium area. SCDH intends to leverage nonfederal resources, (e.g. state and local funds for downpayment assistance) to meet affordable housing needs. SCDH also intends to assist philanthropic efforts to meet the housing needs of low-income and special needs groups (e.g. the Plough Foundation's Aging in Place Initiative).

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

SCDH is not a recipient of Continuum of Care funds. Funds for the community are awarded to the City of Memphis.

The City of Memphis operates a central intake and assessment for all families facing homelessness. It includes a 22-hour/day phone-based screening, as well as face-to-face intake and assessment during the business day. This year, coordinated assessment was launched for single individuals that include the 100K Homes Vulnerability Index (VI) and a second-level assessment replicated from Seattle's DESC known as the Vulnerability Assessment Tool (or VAT). The Hospitality Hub and the H.O.P.E. organizations provide the initial vulnerability screenings using the VI and 9 specially trained outreach workers complete the lengthier and more clinical VAT for those found vulnerable under the VI. Those with a score of 25 or higher on the VAT are given priority access to permanent supportive housing resources offered by local CoC agencies. Additionally, there are 8 full time outreach professionals. Six of whom are employed by Case Management Inc. through the PATH program. Two other non-profits, HOPE and Outreach Housing and Community, also specialize in street outreach and engagement.

Addressing the emergency and transitional housing needs of homeless persons

While the number of emergency shelter and transitional housing units has grown each year, the availability of free emergency shelter that meets basic standards of care remain a concern for our community. From the Continuum of Care standpoint, Memphis far exceeds the targets for exits to permanent housing. Therefore, Memphis' primary goal is to sustain this success by continued training of local providers and by ensuring funding for rapid rehousing continues. Two SHP grantees expect to convert their transitional housing grants to Rapid Rehousing over the next twelve months as long as they are not required to rely on a unit of local government to process payments.

Memphis' Action Plan to End Homelessness calls for sustained investment in rapid rehousing and increased permanent housing capacity. Both of these permanent housing programs will help increase the success of persons leaving transitional housing programs. The Memphis VA Medical Center has adopted a plan to end Veteran homelessness within 5 years, which has been incorporated into the local Action Plan to End Homelessness. The City of Memphis reports a very close collaborative relationship with the VA staff. The VA Medical Director serves on the Memphis Mayors' Committee to End Homelessness, chairs the veterans subcommittee, and actively participates in street outreach, 100K Homes (in partnership with Shelby County), and Project Homeless Connect. The City of Memphis coordinates strategies and funding priorities to align with the mutual goal to end veteran

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homelessness and to reflect current capacity/gaps assessments. Most of the veteran service organizations that are funded by the VA are also funded by the SHP or ESG programs, and are therefore subject to the same performance management process. This includes Alpha Omega Veterans Services, CAAP, Catholic Charities, and Barron Heights.

For unaccompanied youth, the two primary providers are Porter Leath and Youth Villages. In the development of the Action Plan to End Homelessness, Memphis convened a focus group of staff from these two programs as well as Department of Children's Services and developed recommendations on how to improve resources. Status reports from both program liaisons who indicate that there has been no significant change in the demand for services. Youth Villages has received a significant private grant to greatly expand resources for youth aging out of foster care and the City of Memphis expects this to have a strong preventive impact on the population of homeless young adults. Also, Memphis received a grant from the US Department of Health and Human Services to establish 60 units of permanent supportive housing for child welfare involved families and expect some of these families to be mothers aging out of foster care with their own children. This project is in direct response to goals of the CoC and Action Plan to End Homelessness.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Pursuant to the Memphis Action Plan to End Homelessness, Memphis has increased the permanent housing capacity in the community. The Continuum of Care committed to implementing this by a performance-based process so that the lowest performing programs are reallocated. Partnerships with the City of Memphis, Memphis Housing Authority, Veterans Administration, Community Solutions thorough the 100,000 Homes Campaign are expected to enhance permanent housing resources dedicated to addressing homelessness.

The Memphis/Shelby County Homeless Consortium employment committee continues to seek ideas and strategies to increase employment among participants and will seek to expand our partnership with the local workforce investment network to include grant-funded activities such as transitional jobs. The homeless union, H.O.P.E. is implementing a social entrepreneurship program to make t-shirts and promotional items for other non-profits and through this venture will provide employment and training opportunities for people who are currently homeless. Finally, the CoC will work with permanent supportive housing providers and vocational rehabilitation programs on strategies to promote both earned income and volunteer activities that will not impact the participants disability benefits. The Memphis/Shelby County Homeless Consortium's long-range goal is to develop a specific, funded, and

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dedicated employment program that is available to all participants in homeless programs in the County. It is believed that this is the best way to ensure that the hands-on assistance with job applications and job retention will be successful.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Discharge planning from primary institutions including foster care, corrections, psychiatric and other hospitals is described below based upon information in the current City of Memphis Consolidated Plan. Foster Care: The State Department of Children's Services has a policy on preventing discharge into foster care.

Local Hospitals: The local hospitals have their own discharge policies and staff responsible for discharge planning. Hospital social work staff seek to avoid readmissions by improving patients stability as they exit care. This is frequently a challenge, but service provider agencies routinely assist staff at The Med, Baptist, Methodist, and St. Francis, with referrals and linkages whenever possible.

Mental Health Institutions: Under the 100,000 Homes Campaign, permission has been sought from each unsheltered and vulnerable homeless citizen to share information with medical care and mental health professionals to assist them with housing. Individuals entering a mental health facility are provided discharge options in coordination with the staff at the facility. While consumers cannot always be convinced to accept a housing placement, improved communication greatly assists with establishing discharge housing and support services plans. A local expert who serves as the Housing Facilitator for the State mental health department has proven very effective at addressing any concerns that may arise if discharge policies are not being adhered to.

Corrections: The Memphis and Shelby County Homeless Consortium includes active representation from the Shelby County Office of Corrections. The primary reentry program in the community, Three R, works to establish discharge plans from the time that individuals are first incarcerated to avoid exits to homelessness. There are several officially sanctioned halfway houses in the community including Harbor House, Karat Place, and WestCore to provide opportunities for those exiting jails and prison to re-establish themselves, seek employment and support services, and avoid homelessness.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

SCDH plans a comprehensive approach to addressing LBP hazards and increasing access to housing units without LBP hazards.

Through the Housing Rehabilitation Program, SCDH will continue to comply with the HUD Lead Safe Housing Rule. Targeted housing units assisted through this program will each undergo a paint inspection and risk assessment by a Tennessee Department of Environment and Conservation (TDEC) certified Risk Assessor to identify all LBP hazards. Work specifications will be developed by a TDEC certified Risk Assessor to address all identified LBP hazards in conjunction with the housing rehabilitation work specifications. TDEC certified Lead Abatement firms, using TDEC certified supervisors and workers, will be selected to address the LBP hazards in accordance with the work specifications. Upon completion of the housing rehabilitation, a clearance examination will be conducted by a TDEC certified Risk Assessor to insure that each unit is lead safe. The Lead abatement Firm will be responsible for any recleaning and reexamination costs associated with failed clearance examinations until clearance is achieved.

SCDH will continue implanting and administering the Lead Hazard Control Program (LHCP) funded in part by a 2013 Lead Based Paint Hazard Control Grant awarded by the HUD OHHLHC. The grant term is August 1, 2013 through July 31, 2016. As resources permit, it is anticipated that SCDH will seek additional OHHLHC assistance to continue the LHCP. The LHCP program will address LBP hazards in the same manner as described above for the housing Rehabilitation. The LHCP includes an extensive community education and outreach component primarily targeting families with children less than 6 years of age, as well as training and certification opportunities for Section 3 contractors interested in TDEC Lead Abatement Certification.

Finally, SCDH will evaluate private requests for assistance (outside the scope the Housing Rehabilitation program and LHCP) in addressing LBP hazards. As local resources allow, SCDH will provide technical assistance, education, and in response to such requests on a case by case basis.

How are the actions listed above related to the extent of lead poisoning and hazards?

All housing units built before 1980 are counted herein as potentially having lead-based paint hazards present because 1978 was the first year Federal law prohibited lead in residential paint. Housing age is available in increments of ten year time periods through 1990. As not all supplies of lead-based paint were used up immediately after enactment of the ban, there will be instances wherein paint with lead was used in houses built shortly after the ban. Thus, in order to develop a conservative estimate of the

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of housing units that contain lead-based paint hazards, houses built through 1979 are counted. 2009 American Community Survey data indicates that 240,632 of the 398,274 housing units in Shelby County potentially have LBP hazards.

The Shelby County Health Department (SCHD) provided SCDH with data on the number and percentage of children screened and reported as having Elevated Blood Lead (EBL) Levels greater than or equal to 10 micrograms per deciliter ($\mu\text{g}/\text{dL}$) in 2010 and 2011 and greater than or equal to 5 micrograms per deciliter ($\mu\text{g}/\text{dL}$) in 2012. This data was reported through the Tennessee LeadTRK Screening Data system by medical providers and data cleaning was done to remove patients who did not live in Shelby County. The attached table includes data from three years to illustrate ongoing need. Of the estimated 79,690 children at or under age of six, roughly 25 percent were tested in 2010-2012, and 0.6 percent had blood lead levels equal to or greater than 10 $\mu\text{g}/\text{dL}$. Furthermore, 4.7% of the estimated 18,647 children screened in 2012 had blood lead levels at or above the CDC level of concern of $\geq 5 \mu\text{g}/\text{dL}$. If these rates are applied to the estimated 79,690 in Shelby County, potentially 318 children below age 6 have blood lead levels equal to or greater than 10 $\mu\text{g}/\text{dL}$ and 3,745 children below age 6 have blood lead levels within the CDC level of concern.

The resources SCDH expects to make available will help to directly address a share of the overall housing stock with LBP hazards. The LHCP program is designed to protect those most at risk – children less than 6 years of age in low- and moderate-income households. Since the LHCP and Housing Rehabilitation Programs resources are limited in the impact each can have overall in terms of units with LBP hazards, SCDH intends to supplement these efforts with extensive education and outreach primarily geared towards healthy homes including protecting occupants from potential LBP hazards.

How are the actions listed above integrated into housing policies and procedures?

Policies and procedures for the Housing Rehabilitation Program are structured to insure that all program facets comply with all applicable TDEC and HUD requirements including the HUD Lead Safe Housing Rule. Similarly, policies and procedures for the LHCP are structured to ensure compliance with all applicable TDEC and HUD requirements including OHHLHC policy guidance.

Year	Children ≤ Age 6 Screened	Number children ≥ 10 µg/dL	% of children screened	Numbers by EBL Level at first screening					
				05-09 µg/dL	10-15 µg/dL	16-19 µg/dL	20-44 µg/dL	45-69 µg/dL	≥70 µg/dL
2010	21,596	130	0.6%	**	102	14	14	0	0
2011	20,587	150	0.7%	**	120	14	13	1	2
Year	Children ≤ Age 6 Screened	Number children ≥ 5 µg/dL	% of children screened	05-09 µg/dL	10-15 µg/dL	16-19 µg/dL	20-44 µg/dL	45-69 µg/dL	≥70 µg/dL
2012	18,647	868	4.7%	775	69	13	10	1	0

**** October 2011, CDC lowered the level of concern to a blood lead of ≥ 5 µg/dl ****

www.cdc.gov/nceh/lead

Data Source: Tennessee LeadTRK Screening Data & Shelby County Health Department

- Dataset used for this analysis was exported from LeadTRK on 01/04/2013 and included all results where the address county was within Shelby County.
- If address information was judged to be outside of Shelby County the record was removed. If it was inconclusive, the record was kept.
- If a child was tested multiple times the data exported includes only their first test.
- Data includes children ≤ 72 months old.

Elevated Blood Lead Level Data

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SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Many of the programs and activities outlined in the 5 Year Strategy are related to reducing poverty. Housing activities responsive to those with special needs (such as the elderly and physically disabled) are geared toward those most in need, while others, including promotion of homeownership, Section 3 outreach and contracting, and contractor training programs are long terms strategies to combat poverty. These include the following:

Section 3 outreach. Shelby County Department of Housing intends to continue coordinating with the Shelby County Department of Equal Opportunity Compliance (EOC) and Shelby County Department of Purchasing to recruit Section 3 contractors and vendors. As part of the overall vendor and EOC compliance process, vendors are provided with Section 3 certification information and asked to submit the information along with other vendor information. Businesses indicating that they are Section 3 are encouraged by the Department of Purchasing to bid on covered projects and are referred to the Department of Housing. Shelby County Department of Housing will continue to hold annual contractor meetings to inform contractors of Section 3 opportunities. All bid notices issued by the Shelby County Department of Housing will continue to encourage Section 3 participation. All contracts drafted by Shelby County Department of Housing will continue to include the Section 3 language to encourage contractors to further comply with Section 3 requirements.

Contractor training and certification. Shelby County Department of Housing intends to continue offering reimbursement to Section 3 Contractors and employees for Lead Abatement training and certification as long as Lead Hazard Control Grant funds permit.

Reimbursement will be offered on a first-come first-served basis as budgeted funds permit and will include the following:

- Up to 50% of the cost for Initial Supervisor Training for one Section 3 certified individual by a Tennessee Department of Environment and Conservation (TDEC) certified and accredited training provider (or \$250, whichever is less).
- Up to 50% of the cost for Initial Worker Training for up to two Section 3 certified individuals by a TDEC certified and accredited training provider (or \$100, whichever is less).
- TDEC Initial Supervisor Certification for one Section 3 certified Supervisor.
- TDEC Initial Worker Certification for no more than two Section 3 certified Workers.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

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The Section 3 outreach and contractor training initiatives planned by SCDH complement and directly support affordable housing activities in this plan. Particularly, the training and certification opportunities for Section 3 contractors and individuals help to expand the pool of new contractors and workers participating in the Lead hazard Control Program as well as the Housing Rehabilitation Program.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

It has been, and will continue to be, SCDH's responsibility to monitor subrecipient organizations for compliance with federal, state, and local policies and regulations. SCDH will continue to monitor all subrecipients. SCDH routinely allocates CDBG funds to municipal governments in the Urban County Jurisdiction as well as local non-profit Community Housing Development Organizations (CHDOs). On all projects, SCDH holds award conferences upon notification of funding in order to ensure the recipients understand the responsibilities placed upon them. In the case of rehabilitation projects, pre-construction conferences are scheduled prior to the start of each job with the housing inspector, homeowner, and contractor. Prior to issuing payment for any goods provided or services rendered, SCDH verifies that the goods or services have been provided and program requirements have been met. For housing rehabilitation and minor home repair projects, SCDH staff will make periodic site visits as necessary and appropriate depending on the nature and scope of each activity. Before approving any partial or final reimbursements for such work, SCDH will inspect all work covered within the reimbursement request to insure it has been completed in accordance with SCDH specifications.

For community development projects, SCDH staff will make at least one on-site monitoring visit to complete worker interviews for Davis-Bacon compliance purposes and to assess activity progress. As an additional step, SCDH will continue to administer homeowner satisfaction surveys to those who receive assistance through the Shelby County Housing Rehabilitation and Minor Home Repair Programs. The homeowner satisfaction survey will continue to be used to monitor and gauge client satisfaction with the quality of work carried out under the Shelby County Rehabilitation and Lead Hazard Control Programs.

As opportunities arise to coordinate outreach efforts, such as in conjunction with efforts lead by the Shelby County Equal Opportunity Commission, SCDH will do so to encourage participation in SCDH bidding and contracting opportunities by minority and women owned business as well as Section 3 contractors.

Throughout the term of this 5 year Strategy, SCDH will be directly responsible for meeting all long-term Comprehensive Planning requirements including requirements related to planning, reporting, and citizen participation.

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Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated CDBG and HOME resources, including the PY2014 allocation and projected resources for the remaining term of the 5 Year Strategy (assuming level program funding), are shown below.

SCDH proposes applying all CDBG program income received during each program year toward the Housing Rehabilitation Program and/or Minor Home Repair Program.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,065,000	10,000	0	1,075,000	4,300,000	These anticipated resources are based upon generally level funding as of PY14.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	299,203	5,000	0	304,203	1,216,812	These anticipated resources are based upon generally level funding as of PY14.

Table 55 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will leverage additional resources including approximately \$150,000 in private funds through nonprofit CHDO developers receiving the HOME CHDO set-aside funds and approximately \$336,600 in local funds to meet HOME matching requirements.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

It is not anticipated that publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

Discussion

These anticipated resources are based upon generally level funding CDBG and HOME funding consistent with Program Year 2013 allocations. Dramatic or unexpected shifts in funding could substantially alter this description of anticipated resources.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve & create housing affordability & choice	2014	2018	Affordable Housing Non-Homeless Special Needs Fair Housing	Shelby County Urban County Entitlement Area	Housing Rehab, Modification, Repair, & Choice	CDBG: \$325,000 HOME: \$329,628	Homeowner Housing Rehabilitated: 21 Household Housing Unit
2	Reduce the harmful affects of lead-based paint	2014	2018	Lead-Safe Housing for Families with Children under 6 Years of Age	Shelby County, Tennessee	Housing Rehab, Modification, Repair, & Choice	CDBG: \$100,000	Homeowner Housing Rehabilitated: 24 Household Housing Unit
3	Improve communities	2014	2018	Non-Housing Community Development	Shelby County Urban County Entitlement Area	Flood Drain Improvements Parks and Recreational Facilities Senior Centers Sidewalks Street Improvements Water and Sewer Improvements	CDBG: \$218,107	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 475 Households Assisted

Table 56 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve & create housing affordability & choice
	Goal Description	This goal will be accomplished through housing rehabilitation and utilizing the CHDO set aside funds.
2	Goal Name	Reduce the harmful affects of lead-based paint
	Goal Description	This goal will be accomplished by repairing 24 homeowner units to make them lead safe.
3	Goal Name	Improve communities
	Goal Description	This goal will be accomplished through infrastructure or public facilities projects.

Projects

AP-35 Projects – 91.220(d)

Introduction

Funds allocated during the 2014 Program Year will be used for the following activities: Housing rehabilitation and minor home repair using CDBG and HOME funds, CHDO affordable housing project using the HOME CHDO set-aside, a community development infrastructure project using CDBG funds, program delivery costs using CDBG funds, and administration and planning costs using CDBG and HOME funds.

Projects

#	Project Name
1	Housing Rehabilitation and Minor Home Repair
2	CHDO Affordable Housing Development
3	Dr. Logan Park Basketball Court
4	Dr. Logan Subdivision Drainage
5	Mill Drainage Improvements
6	Fair Housing - Public Services
7	Program Delivery
8	Administration and Planning

Table 57 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Allocation priorities were based upon needs identified through the citizen participation process as well as from the guidance and input of the Urban County Consortium throughout the planning process. Obstacles to address underserved needs identified in the planning process are primarily a function of limited resources.

AP-38 Project Summary

Project Summary Information

1	Project Name	Housing Rehabilitation and Minor Home Repair
	Target Area	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	Goals Supported	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint
	Needs Addressed	Housing Rehab, Modification, Repair, & Choice
	Funding	CDBG: \$466,065 HOME: \$229,402
	Description	Scattered site housing rehabilitation and minor home repair.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	30 low- and-moderate income owner-occupied homes including some elderly households and some households with children less than 6 years of age.
	Location Description	To be determined based upon client intake/enrollment.
	Planned Activities	Rehabilitation of owner-occupied to bring homes into code compliance and minor home repair to produce lead safe housing for families/households with children less than six years of age.
2	Project Name	CHDO Affordable Housing Development
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Preserve & create housing affordability & choice
	Needs Addressed	Housing Rehab, Modification, Repair, & Choice
	Funding	HOME: \$44,881
	Description	Development of affordable housing by a CHDO using HOME CHDO set-aside funds.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	One low/moderate income homebuyer is expected to benefit from this activity.
	Location Description	To be determined.
	Planned Activities	Acquisition and rehabilitation of a vacant housing unit to create and affordable housing unit for sale to a qualifying low/moderate income homebuyer.
3	Project Name	Dr. Logan Park Basketball Court

	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Improve communities
	Needs Addressed	Parks and Recreational Facilities
	Funding	CDBG: \$10,000
	Description	Remove and replace existing basketball court and install new fencing as a result of a State road widening project on Airline Road that caused a potential safety issue for park users and motorists by placing the road too close to the existing basketball court.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 44 families in 44 dwelling units will benefit from the proposed project.
	Location Description	Dr. Logan Park in Arlington, Tennessee adjacent to Dr. Logan Subdivision.
	Planned Activities	Removal of existing basketball court and installation of new court and fencing.
4	Project Name	Dr. Logan Subdivision Drainage
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Improve communities
	Needs Addressed	Flood Drain Improvements
	Funding	CDBG: \$85,000
	Description	Improve the storm water drainage between Doctor Logan Subdivisions and Doctor Logan Park with concrete swale and a gated entrance to the neighborhood park from the subdivision.
	Target Date	6/30/2014
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 44 families in 44 dwelling units will benefit from the proposed project.
	Location Description	Dr. Logan Subdivision in Arlington, Tennessee.
	Planned Activities	Concrete swale to improve drainage along with gated park entrance.
5	Project Name	Mill Drainage Improvements
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Improve communities
	Needs Addressed	Flood Drain Improvements Parks and Recreational Facilities
	Funding	CDBG: \$85,000
	Description	Improvements to an undersized and deteriorated concrete bottomed open ditch.
	Target Date	6/30/2015

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 431 families in 431 dwelling units will benefit from the proposed project.
	Location Description	Existing ditch roughly between Mills Street and Sycamore Road in Collierville, Tennessee.
	Planned Activities	Construction of a flat bottom open ditch with a paved trail on one side of the bank with a row of trees planted on both sides of the bank as a community enhancement.
6	Project Name	Fair Housing - Public Services
	Target Area	Shelby County, Tennessee
	Goals Supported	Preserve & create housing affordability & choice
	Needs Addressed	Housing Rehab, Modification, Repair, & Choice
	Funding	CDBG: \$50,000
	Description	Fair housing outreach in partnership with Memphis Area Legal Services.
	Target Date	6/30/2014
	Estimate the number and type of families that will benefit from the proposed activities	Through the Fair Housing Center and Memphis Area Legal Services, SCDH expects to provide housing and fair housing services for 90 residents of Shelby County.
	Location Description	This is a Public Service activity and is not associated with a specific location.

	Planned Activities	<p>The Fair Housing Center will document the nature and resolution of calls, make appropriate referrals, maintain demographic data, provide or refer clients to court representation, provide community education and outreach, and assist clients in resolving housing issues. A total of 90 Shelby County residents will be screened and/or served by this Project. Education and outreach will include 2 (two) seminars and/or group presentations on housing and fair housing issues. MFHC will also assist the County in addressing the barriers identified in the County's Analysis of Impediments to Fair Housing (AI).</p> <p>Complaints of alleged housing discrimination received from any source will be investigated and demographic data will be compiled concerning the facts surrounding the complaint, including the name of complainant, date of the complaint, nature of the problem, staff person(s) handling the complaint, the ethnic background of each client, the date the case is closed, and the resolution of the complaint.</p> <p>MFHC will screen housing complaints, accept housing complaints for investigation, and</p> <p>provide legal representation in cases involving the Fair Housing Act, The Uniform Landlord Tenant Act of Tennessee, The Housing Voucher Program, Tax Sales of Real Property, housing code violations and other issues related to equal housing opportunities.</p> <p>Additionally, MFHC will determine whether the complaint involves a fair housing violation. If the complaint is determined to be a possible violation of the fair housing laws, MFHC will investigate and enforce the fair housing laws.</p> <p>Testing and other methods will be used to investigate systemic housing discrimination</p> <p>or individual discrimination complaints. MFHC will use the procedure as set forth in the John Marshall Law School Tester Training Manual for recruiting and training prospective testers. A file will be maintained on the training of testers, on each tester trained and on all tester visits. No staff members, their immediate family members, or any persons involved with a fair housing complaint will be used as testers.</p> <p>MFHC will also assist the County in addressing the barriers identified in the County's Analysis of Impediments to Fair Housing (AI).</p>
7	Project Name	Program Delivery
	Target Area	Shelby County Urban County Entitlement Area
	Goals Supported	Preserve & create housing affordability & choice Improve communities

	Needs Addressed	Housing Rehab, Modification, Repair, & Choice
	Funding	CDBG: \$165,935
	Description	Implementation of CDBG programs.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Not applicable.
	Planned Activities	Not applicable
8	Project Name	Administration and Planning
	Target Area	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	Goals Supported	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint Improve communities
	Needs Addressed	Housing Rehab, Modification, Repair, & Choice Flood Drain Improvements Parks and Recreational Facilities
	Funding	CDBG: \$213,000 HOME: \$29,920
	Description	General administrative and planning activities necessary to operate HOME and CDBG programs.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Not applicable.
	Planned Activities	Not applicable.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

There are seven municipalities in Shelby County including Arlington, Bartlett, Collierville, Germantown, Memphis, Millington, and Lakeland. The Shelby County Urban Entitlement includes unincorporated Shelby County and all of these municipalities except Memphis.

Geographic Distribution

Target Area	Percentage of Funds
Shelby County Urban County Entitlement Area	85
Shelby County, Tennessee	15

Table 58 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. This is primarily because concentrations of low- and moderate-income areas in the jurisdiction are limited, low- and moderate-income area and households are spread throughout the jurisdiction, and assistance is allocated based upon population data from each of the 6 municipalities within the jurisdiction. The Shelby County Urban Entitlement Area is a diverse community including a mixture of suburban and rural development. Fair Housing activities and Minor Home Repair in support of the Lead Hazard Control Grant will be conducted on a county-wide basis. It is estimated that no more than 15% of funds will be used on a county-wide basis.

Discussion

Housing services offered in accordance with this Strategic Plan will be made available on a county- or jurisdiction-wide basis. Non-housing community development activities will be rotated among the urban county consortium members as resources permit and in accordance with the Strategic Plan to provide benefits in low- and moderate-income areas or direct benefit to low- and-moderate income clients as applicable.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

SCDH has a one year affordable housing goal to assist 44 households through rehabilitation including 20 complete housing rehabilitation projects in the Urban County and 24 units receiving minor home repair to address lead-based paint hazards. Additionally, as part of the 20 complete housing rehabilitation projects in the Urban County, SCDH has established an associated and linked one year affordable housing goal that 5 of these households will be non-homeless special needs households.

SCDH has also established a one year affordable housing goal to acquire one existing housing unit using CHDO set aside funds. It is anticipated that awarded CHDO funds beyond the cost of acquisition may be applied to eligible rehabilitation costs associated with the acquired unit.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	25
Special-Needs	5
Total	30

Table 59 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	30
Acquisition of Existing Units	1
Total	31

Table 60 - One Year Goals for Affordable Housing by Support Type

Discussion

SCDH's one year affordable housing goals will be carried out through housing rehabilitation and minor home repair as well as through HOME CHDO set aside funds. Since SCDH is not a recipient of Continuum of Care funds, resources to directly support the homeless are unavailable.

AP-60 Public Housing – 91.220(h)

Introduction

The Millington Housing Authority requires little assistance from the SCDH. Kefauver Estates, the remaining public housing facility in the Urban County, is operated by the Memphis Housing Authority. SCDH will continue to assist both housing authorities as needed to ensure that its needs are met and the goal of providing safe, decent, and affordable housing for its residents is obtained.

Actions planned during the next year to address the needs to public housing

In Program Year 2014, The Shelby County Department of Housing will continue its efforts to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the Millington Housing Authority.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Memphis Housing Authority has a Resident Advisory Board (RAB) established to provide activities and advocate for the rights of residents. The Memphis Housing Authority RAB is also responsible for assisting with and commenting on Memphis Housing Authority's 5 -Year Planning process. The Millington Housing Authority also has a Resident Advisory Board that meets annually. Additionally, MillHA publishes a newsletter to engage and inform residents.

As for homeownership, SCDH plans to continue implementing a homebuyer downpayment assistance program during the program year. This program could benefit qualified public housing residents seeking to own their own home. This program is funded using state and local funds. MillHA indicated it does not have plans to encourage public housing residents to participate in homeownership.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Neither PHA is designated as troubled.

Discussion

Both public housing authority operations located within the Urban County Entitlement Area are small and rely upon Resident Advisory Boards to encourage resident involvement in management. Neither is designated as troubled.

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AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Shelby County is not a recipient of ESG grant funds and has not established one-year goals to utilize CDBG or HOME funds directly for homeless reduction activities. Activities to address these issues are coordinated with the City of Memphis and the Community Alliance for the Homeless.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The community's outreach and engagement approach includes a phone-based hotline, two walk-in centers, and roving street outreach presence. For families with children, there is a centralized intake that screens, on average 500 families per month and a phone-based hotline receives 1,800 calls/month. Through implementation of the 100,000 Homes/Memphis100 initiative, a street outreach team meets weekly to discuss and prioritize the vulnerable unsheltered individuals in the community. This has brought to light the importance of street outreach and the need to enhance funding for outreach and engagement activities. Memphis is also establishing an electronic assessment and referral tool to maximize existing resources and make it easier for people experiencing homelessness to seek help.

Addressing the emergency shelter and transitional housing needs of homeless persons

Memphis has identified the need for free/no fee emergency shelter especially for single women and intends to convert existing transitional housing programs to rapid rehousing or permanent supportive housing. Memphis will maintain and target remaining transitional housing programs for populations most likely to leave homelessness through this intervention and who will not qualify for permanent supportive housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals

and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

For chronically homeless individuals and families, the Memphis Mayors' Action Plan calls for an additional units of permanent supportive housing. Many of the units added so far are designated for chronically homeless veterans.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City of Memphis Emergency Housing Partnership serves households with homeless prevention assistance in the upcoming year through the Emergency Solutions Grant program. MIFA's central assessment process helps mediate with more than three thousand families each year who avoid homelessness as a result. Partnerships with the public institutions including foster care, corrections, and hospitals continue to improve. Funding and a non-profit sponsor that could provide respite care to those who are homeless and have had or are awaiting surgery or other medical procedures that make it unsafe for them to discharge to homelessness has been identified as a strategy to pursue. Memphis has a Housing First Assertive Community Treatment team that provides intensive, integrated treatment for dually diagnosed chronically homeless individuals who reside in permanent housing. This team, supervised by Comprehensive Counseling Network includes mental health professionals, physical health professionals, case managers, and peer support specialists. They are poised to serve individuals who are housed by one of eight permanent supportive housing providers. The services people leaving institutions are expected to need are housing, community based mental health counseling and treatment, physical health care, employment services, substance abuse counseling and treatment, disability benefit application assistance, and legal advocacy/services.

Discussion

Since Shelby County is not a recipient of ESG grant funds, it has insufficient resources for direct expenditures to carry out homeless reduction activities. Efforts to address these issues are coordinated with the City of Memphis and the Community Alliance for the Homeless. During the program year, SCDH will support those efforts as necessary and appropriate as well as to the greatest extent feasible.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Based on the 2011 Shelby County Analysis of Impediments to Fair Housing, the following are public policy related barriers to affordable housing:

Land Acquisition Costs. High cost makes affordable housing development in the urban county very difficult, if not impossible.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing. The tax rate for multi-family rental housing is substantially higher than the rate for single-family housing.

Lack of other resources and incentives to develop affordable housing in the consortium area. There are little or no other governmental or philanthropic resources or incentives for affordable housing development within urban county.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Land Acquisition Costs. SCDH anticipates using HOME CHDO funds to assist nonprofit affordable housing developers with costs, including acquisition costs, necessary to create affordable housing opportunities.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing. SCDH intends to coordinate efforts with THDA to make information available about Tax Credits, their use in Shelby County and other State programs available at the local level, including outreach workshops to provide direct information on both state and local initiatives.

Lack of other resources and incentives to develop affordable housing in the consortium area. SCDH intends to leverage nonfederal resources, (e.g. state and local funds for downpayment assistance) to meet affordable housing needs. SCDH also intends to assist philanthropic efforts to meet the housing needs of low-income and special needs groups (e.g. the Plough Foundation's Aging in Place Initiative).

Discussion:

Barriers to affordable housing coincide with many impediments to fair housing, as protected classes
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often are low-income and face disparate impacts by virtue of income as well as race or other protected class. As a result, the identified barriers to affordable housing mirror some of the impediments to fair housing identified in Shelby County's Analysis of Impediments to Fair Housing.

AP-85 Other Actions – 91.220(k)

Introduction:

Shelby County plans other actions during the Program year including actions to address obstacles to meeting underserved needs, to foster and maintain affordable housing, to reduce lead-based paint hazards, to reduce the number of poverty-level families, to develop institutional structure, and to enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

SCDH will continue to work with and coordinate activities with the Shelby County Community Services Agency (CSA) in their efforts to meet the underserved needs in the Shelby County Urban County Entitlement Area. CSA offers various programs targeting individuals and families with low- to moderate-incomes such as rent/mortgage assistance, utility assistance, weatherization, and referrals for the homeless population.

Additionally, SCDH will provide referrals as necessary to the Aging Commission of the Mid-South. The Aging Commission provides assistance to the senior population of Shelby County through programs including Alzheimer's service, home care, legal assistance, long term care ombudsman services, nutrition services, public guardianship, and transportation.

Finally, the SCDH Administrator plans to remain involved in the Plough Foundation's Aging Initiative Bringing awareness to the comprehensive needs of the older citizens of our community needs to be a strategic priority because of its profound impact on our society.

Actions planned to foster and maintain affordable housing

The Annual Plan is driven by three goals, and two of these are directed towards fostering and maintaining affordable housing. The two goals emphasizing fostering and maintaining affordable housing are:

- Preserve the existing housing stock and create opportunities for affordable housing, and
- Reduce the harmful affects of lead-based paint.

These goals will be accomplished through the rehabilitation of housing in the Urban County and addressing lead-based paint hazards (including repairs to address deteriorated painted surfaces) in eligible homes in Shelby County having children less than 6 years of age.

Actions planned to reduce lead-based paint hazards

SCDH will continue to implement the Lead Hazard Control Program to address lead-based paint hazards

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in Shelby County homes having children less than 6 years old. CDBG funds as described in the

“Anticipated Resources” subsection will be used as match to supplement these efforts. These CDBG funds should assist 24 homeowners during the program year.

Additionally, all pre-1978 housing rehabilitated using CDBG or HOME funds (including CHDO funds) will be evaluated for the presence of lead-based paint hazards. As with the units assisted using Lead Hazard Control Funds, Risk Assessors certified by the Tennessee Department of Environment and Conservation (TDEC) will complete paint inspections using X-ray Fluorescence (XRF devices) and collect environmental samples that will be used to complete a Risk Assessment to identify all lead-based paint hazards and provide recommendations to address the hazards. Methods to address hazards may be in the form of interim control, abatement, or a combination of the two based on considerations including budgets, energy efficiency, Lead Safe Housing Rule requirements, and other state, federal, and local requirements.

Actions planned to reduce the number of poverty-level families

SCDH plans to provide supplemental assistance in the form of housing rehabilitation, minor home repair and lead-based paint hazard controls to reduce housing costs among low- and moderate-income households, including the impoverished. SCDH plans to provide supplemental assistance in the form of housing rehabilitation, minor home repair and lead-based paint hazard controls to reduce housing costs among low- and moderate-income households, including the impoverished.

Additionally, the primary aim of Shelby County Government’s Community Services Agency (CSA) is breaking the generational cycle of poverty requires changes in attitude, living conditions, education, and aspirations of its victims.

Working with nonprofit organizations, other branches of government, other governmental agencies, and citizen committees, the agency plans and carries out programs for low-income residents. These programs emphasize self-help.

Every year, CSA serves about 1,650 households assisting with cooling their homes in summer, and assists another 13,000 households with heating their homes in the winter. The county’s weatherization program is for low-income persons. The weatherization program provides free minor home repairs, such as fixing broken windowpanes and rotted windowsills, which lower energy costs.

Actions planned to develop institutional structure

As the primary organization responsible for the administration of funds, implementation of projects and programs, and the expenditure of all grant allocations, SCDH will coordinate efforts and activities within the Urban County community. This coordination will involve the administration and delivery of all CDBG

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and HOME funds as well as activities funded with these funds. SCDH operates under the direct authority of the Mayor of Shelby County and will continue to be advised by the UCC. Shelby County Government will contract with the respective municipalities for all community development projects during the program year and will directly administer and/or deliver those programs/projects associated with Housing Rehabilitation and Minor Home Repair. This structure will enable all municipalities and Shelby County to have direct control of these funds. The Mayor of Shelby County, representing the Entitlement Area as a whole, will have final approval of all expenditures.

During the 2014 Program Year, SCDH will continue to take advantage of upcoming training opportunities for staff directly involved in the delivery and administration of funds. SCDH will also provide training to the staff of its Urban County partners as requested in order to insure that participating municipalities are aware of their responsibilities under the entitlement programs.

Actions planned to enhance coordination between public and private housing and social service agencies

In order to enhance coordination between public and private housing and social service agencies during the year, SCDH will continue to strengthen existing and seek out and solidify new partnerships with housing, health, and social service agencies that will enable Shelby County to make progress towards achieving the goals of the Consolidated Plan. Furthermore, the department will continue to work with local non-profits, CHDOs, and other agencies carrying out housing and community redevelopment efforts in order enhance overall coordination of activities at the local level.

Discussion:

In addition to these other described actions planned for the program year, SCDH intends to continue addressing impediments to fair housing identified in the Shelby County Analysis of Impediments to Fair Housing and also plans to continue efforts to provide outreach and training to Section 3 contractors.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed was estimated based on an average of program income accrued to previous years as reported in the last five Consolidated Annual Performance Report. SCDH will not be receiving any Section 108 loan proceeds, surplus funds from urban renewal settlements, grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan, or income from float-funded activities.

SCDH does not plan to expend funds on any Urgent Need activities. SCDH intends to use 100% of CDBG funds (subject to the low/mod benefit calculation) for activities that benefit persons of low- and moderate-income.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	3,182
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	3,182

Other CDBG Requirements

1. The amount of urgent need activities	0
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2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

100.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

No HOME will be used as forms of investment that are not described in Section 92.205.

SCDH will leverage the use of HOME funds through its partnerships with CHDOs who will provide private sources of funding.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

When HOME funds are utilized for a homebuyer activity, contracts and restrictive covenants will ensure affordability of units acquired with HOME funds. Developers will be required to include a recapture provision in all agreements in order to ensure affordability. When new construction occurs using HOME funds, the affordability period will be determined as follows:

- 5 years when using less than \$15,000 in HOME funds,
- 10 years when using \$15,000 to \$40,000 in HOME funds, and
- 15 years when using more than \$40,000 in HOME funds.

If the property is resold or foreclosed upon during the designated period to a buyer who is not an eligible low-income purchaser, SCDH will recapture the original amount of HOME funds invested from the net sales proceeds. However, if proceeds are not sufficient to recapture the full HOME investment plus enable the homeowner fair return of personal funds invested in the downpayment, principal payments, and capital improvements, SCDH may allow recaptured HOME funds to be reduced on a pro rata basis as provided in the HOME Final Rule, or subsequent HUD regulations. All HOME contracts and restrictive covenants contain safe harbor language approved by HUD.

Prior to the sale of a HOME-assisted unit to a first-time homebuyer, the developer must provide SCDH with documentation regarding applicant eligibility, evidence property will constitute their principal residence, and copies of deed provisions relating to the resale of the property providing it will remain affordable for the designated period and providing for the recapture of HOME funds by

SCDH if the property is not sold to an eligible low-income buyer.

Fair return includes seller's payments which are long lasting in nature and add to the capital value of the property. These include additions, upgrades or modifications, and/or improvements that increase the size of the property or create a material addition. Such activities need to be documented by approved permits evidencing completed improvements or executed improvement contracts. Adding appliances such as garbage disposals, water heaters, cabinets, electrical repairs, landscaping, plumbing fixtures, carpets, painting, kitchen exhaust fans, shower doors, and tub enclosures are not eligible for consideration. These guidelines are placed in agreements with developers who shall include references to the recapture guidelines in associated sales contracts, deeds of trust, mortgages, and deed restrictions.

- When the initial homebuyer sells the HOME assisted unit to a non-eligible family, the seller will be entitled to pay-off of first/second mortgages, recover investment (or downpayment), and documented capital improvements expenses in that order. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis.

- The sales price may not prevent a low-income family from purchasing the home. In each case, the following applies in order: the seller can pay-off a first/second mortgage, the seller must determine if he will lower the sales price to comply with HOME regulations governing resale to eligible low-income families or, should proceeds remain, the seller is entitled to recover out-of-pocket downpayment costs and documented capital improvements expenses. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis. The amount repaid shall be reduced by a pro rata fraction according to the anniversary of the closing date.

- If homeowner does not comply with the recapture option, has not made capital improvements, and seeks to sell the property at a price beyond the affordability of a low-income purchaser, the seller will be entitled to pay-off of first/second mortgages. Remaining proceeds may be recaptured by SCDH in an amount up to the full amount of the HOME subsidy assistance.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Units acquired with HOME funds are primarily associated with the CHDO program. In an effort to maintain the focus of the HOME Program, CHDOs shall include a provision in deeds of trust that ensures the housing unit assisted with HOME funds is maintained as an affordable housing unit for low-income families throughout the period of affordability. The deed of trust will need to have legal language in it that indicates whether the recapture or resale option was selected.

Recapture: The legal mechanism used to enforce the repayment of all or a portion of the direct HOME subsidy if the homeowner decides to sell the house within the affordability period. In selecting the recapture option the homeowner may sell the property to any willing buyer. The City requires full repayment of the direct HOME subsidy when resale occurs during the affordability period.

Resale: This option ensures that the HOME-assisted unit remains affordable over the entire affordability period. Therefore if the house is sold the new purchaser must be low-income in accordance with HOME regulations and the house must be the buyer's principle residence.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

SCDH will not be using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Discussion:

The only CDBG program income SCDH expects to be available for use that is included in projects to be carried out is program income accrued from the prior program year. SCDH does not plan to expend funds on any Urgent Need activities and intends to use 100% of CDBG funds (subject to the low/mod benefit calculation) for activities that benefit persons of low- and moderate-income. No HOME will be used as forms of investment that are not described in Section 92.205. SCDH does not propose using HOME funds for homebuyer activities. Guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds are in place and will remain in place. Finally, SCDH will not be using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

SCDH will continue to market programs in an effort to attract more minority contractors. Currently, in an effort to recruit maximum minority participation, SCDH encourages minority contractors to get their *Shelby County, TN 5 Year Strategy and PY 2014 Annual Action Plan*

General Contractors License, advertises rehabilitation bids in the local newspaper, runs public notices soliciting contractors (especially MBEs and WBEs) to participate in rehabilitation programs, provides direct mailings for each bid package to contractors on the rehabilitation vendors list and continuously seeks other methods of recruiting minority general contractors who can bid on larger rehabilitation activities. SCDH also works with the Shelby County Equal Opportunity Compliance Office and the Purchasing Department to ensure that minority-and women-owned firms take advantage of Shelby County's Locally-Owned Small Business Program (LOSB). During the program year, SCDH will continue to enroll and assist MBEs and WBEs to become more competitive and successful in the local market.

Appendix - Alternate/Local Data Sources

1	Data Source Name THDA Median Housing Sales Price (2011)
	List the name of the organization or individual who originated the data set. Tennessee Housing Development Agency
	Provide a brief summary of the data set. Median and average sales prices of new and existing homes are compiled by THDA from actual and up-to-date information pertaining to residential, single-family home sales in Tennessee counties for calendar year 2011.
	What was the purpose for developing this data set? These data, collected locally, become part of a comprehensive database maintained by the Division of Property Assessment (Comptroller's Office, State of Tennessee), and give THDA the opportunity to validate the sales price data in comparison to assessed values of both property and improvement. In addition, information in the database enables THDA to restrict their analysis to actual arm's length transactions.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Data is collected for all counties in Tennessee.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? Calendar year 2011
	What is the status of the data set (complete, in progress, or planned)? Complete

SHELBY COUNTY 5 YEAR STRATEGY AND PY2014 ANNUAL PLAN

Summary of Citizen Participation Comments and Responses

Comment: A telephone call was received on 4/3/2014 from a Millington resident who had read one of the April 2014 public notices. The caller wanted to know if the upcoming hearing meant a waiting list for rental housing would be opened.

Response: The caller was provided an explanation of the purpose of the meeting and informed that SCDH does not maintain a waiting list for rental housing. The caller expressed a need for housing for the mentally disabled and said they were told by the Millington Housing Authority that the waiting list was closed. The caller was referred to SRVS, an area nonprofit serving the disabled, to inquire about services and potential rental housing options. The caller was also invited to call back if the SRVS referral did not produce satisfactory results.

Comment: An email was received on 4/29/2014 from a staff member with the City of Memphis Division of Housing and Community Development (HCD). The individual indicated the plan looked good to them but suggested that the program specific requirements for the HOME program be reviewed to make certain that it incorporated all of the resale and recapture guidelines in the HOME Final Rule.

Response: An email reply was sent to the commenter to let them know the program specific requirements for the HOME program had been reviewed and would be revised to an explanation of fair return guidelines for resale or recapture to ensure the affordability of units acquired using HOME funds.

Application for Federal Assistance SF-424		Version 02
*1. Type of Submission		*2. Type of Application *If Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication	<input checked="" type="checkbox"/> New	
<input checked="" type="checkbox"/> Application	<input type="checkbox"/> Continuation * Other (Specify)	
<input type="checkbox"/> Changed/Corrected Application	<input type="checkbox"/> Revision	
*3. Date Received:		4. Application Identifier:
5a. Federal Entity Identifier:		*5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
* a. Legal Name: Shelby County Government		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 62-000841		*c. Organizational DUNS: 041174889
d. Address:		
*Street1: Shelby County Department Street 2: 1075 Mullins Station Road *City: Memphis County: Shelby *State: TN Province: Country: USA *Zip/ Postal Code: 38134		
e. Organizational Unit:		
Department Name: Housing		Division Name: Planning & Development
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr. First Name: Jim		
Middle Name:		
*Last Name: Vazquez		
Suffix:		
Title: Administrator		
Organizational Affiliation:		
*Telephone Number: (901) 222-7602		Fax Number: (901) 222-7621
*Email: jim.vazquez@shelbycountytg		

Application for Federal Assistance SF-424		Version 02
9. Type of Applicant 1: Select Applicant Type:	B. County Government	
Type of Applicant 2: Select Applicant Type:	- Select One -	
Type of Applicant 3: Select Applicant Type:	- Select One -	
*Other (specify):		
*10. Name of Federal Agency:	Department of Housing & Urban Development	
11. Catalog of Federal Domestic Assistance Number:	14.218 & 14.239	
CFDA Title:	CDBG/Entitlement Grants & HOME Investment Partnerships Program	
*12. Funding Opportunity Number:		
*Title:	CDBG/Entitlement Grants & HOME Investment Partnerships Program	
13. Competition Identification Number:	Not Applicable	
Title:		
14. Areas Affected by Project (Cities, Counties, States, etc.):	Shelby County, Tennessee	
*15. Descriptive Title of Applicant's Project:	Program Year 2014 CDBG and HOME Grant Programs	
Attach supporting documents as specified in agency instructions.		

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:	
*a. Applicant 8 & 9	*b. Program/Project: 8 & 9
Attach an additional list of Program/Project Congressional Districts if needed.	
17. Proposed Project:	
*a. Start Date: 07/01/2014	*b. End Date: 06/30/2014
18. Estimated Funding (\$):	
*a. Federal	\$1,364,203.00
*b. Applicant	
*c. State	\$67,320.00
*d. Local	
*e. Other	
*f. Program Income	\$15,000.00
*g. TOTAL	\$1,446,523.00
*19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372	
*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> **I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix:	*First Name: Mark
Middle Name: H.	
*Last Name: Luttrell	
Suffix: Jr.	
*Title:	Mayor of Shelby County, Tennessee
*Telephone Number: (901) 222-2000	Fax Number: (901) 222-2005
*Email: Mark.Luttrell@shelbycountyn.gov	
*Signature of Authorized Representative:	Date Signed: 5/12/2014

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following field should contain an explanation if the Applicant organization is delinquent on any Federal Debt. Maximum number of characters that can be entered is 4,000. Try and avoid extra spaces and carriage returns to maximize the availability of space.

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

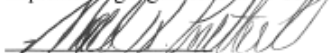
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



Signature/Authorized Official

Date 05/12/2014

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) _____, _____ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.

	05/12/2014
Signature/Authorized Official	Date

Mayor of Shelby County, TN
Title

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

_____ Signature/Authorized Official	NOT APPLICABLE Date
--	------------------------

Title

Specific HOME Certifications


The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature/Authorized Official

05/12/2014

Date

Mayor of Shelby County, TN
Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction's consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature/Authorized Official

NOT APPLICABLE
Date

Title

HOPWA Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

_____	NOT APPLICABLE
Signature/Authorized Official	Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.